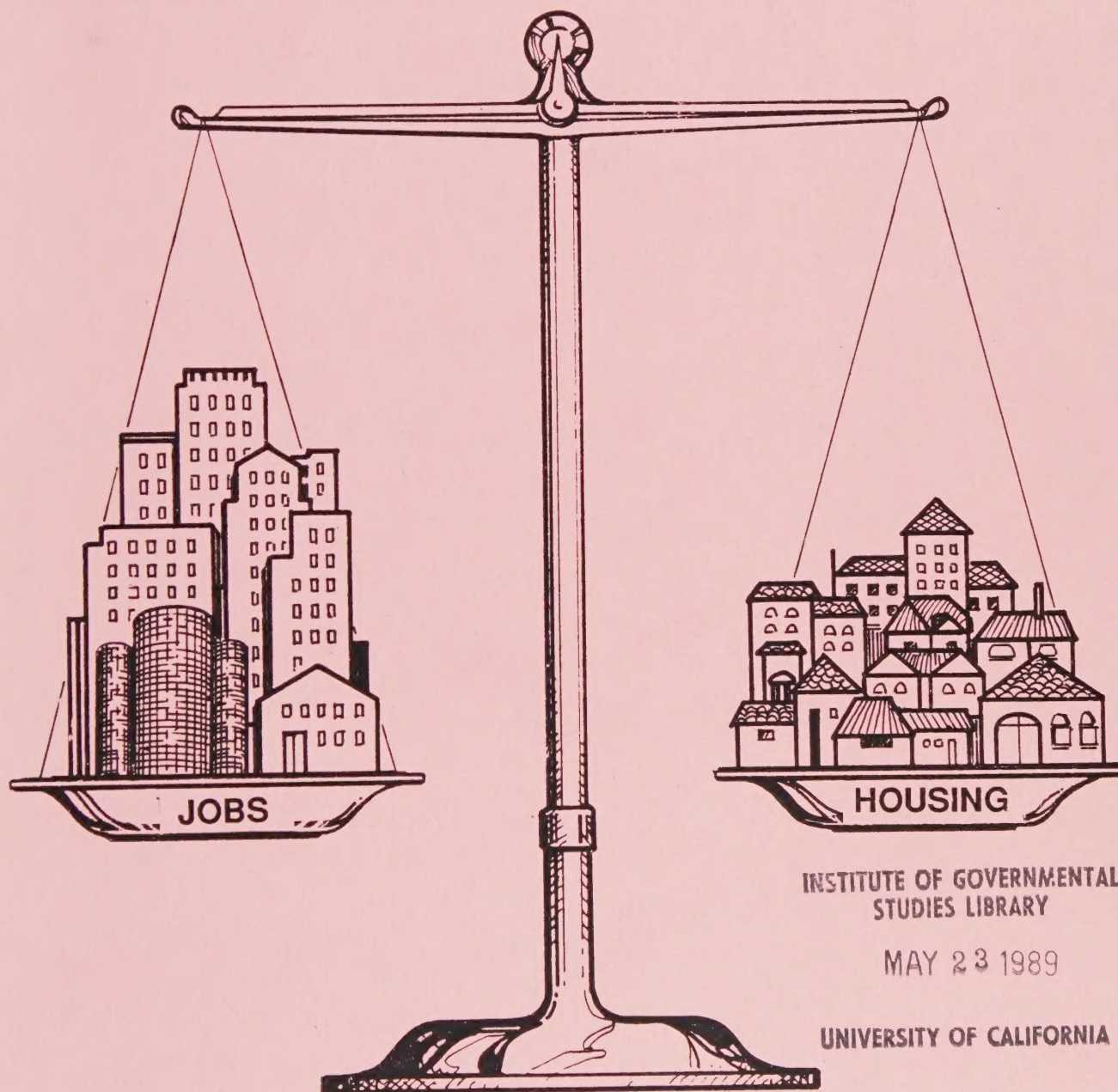


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GROWTH MANAGEMENT PLAN


FINAL ENVIRONMENTAL IMPACT REPORT



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FINAL ENVIRONMENTAL IMPACT REPORT ON THE
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENT'S
DRAFT GROWTH MANAGEMENT PLAN

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CHAPTER 1. PURPOSE AND FORMAT OF THE FINAL ENVIRONMENTAL IMPACT REPORT

Under the California Environmental Quality Act (CEQA), the Southern California Association of Governments (SCAG) is required, after completion of a Draft Environmental Impact Report (DEIR), to consult with and obtain comments from public agencies having jurisdiction by law with respect to the proposed project and to provide the general public with opportunities to comment on the DEIR. SCAG, as lead agency, is also required to respond to significant environmental points raised in the review and consultation process.

This Final EIR (FEIR) has been prepared to respond to the public agency and general public comments received on the DEIR for the Draft Growth Management Plan (GMP), which was circulated for public review in October, November, and December, 1988 and January, 1989. In addition, three public hearings were held before SCAG's Executive Committee on November 3, November 18, and December 15, 1988, to receive input on the adequacy of the DEIR as required by CEQA.

This document has been prepared in the form of an attachment or addendum to the DEIR as allowed by Section 15146(b) of the State CEQA Guidelines. This document and the DEIR, herein incorporated by reference, constitute the FEIR.

This FEIR contains the following chapters:

- o Chapter 2: This chapter includes a description of minor revisions made to the proposed project and a revised version of Table 3-1 ("Summary of Proposed Project Impacts and Mitigation Measures"), to reflect comments received during the DEIR public review process.
- o Chapter 3: This chapter contains copies of all written comments received on the DEIR and a summary of public testimony received at the DEIR public hearings, as well as SCAG's responses to these comments. The written comments and responses and public testimony and responses are arranged by date. Some comments have been cross-referenced to other responses to avoid duplication. Each comment is numbered to correspond to the numbering system indicated next to the response. Some comments do not relate to the adequacy of the GMP DEIR and are therefore responded to in Appendix I of this FEIR or in other documents, as noted. Table 1-1 lists all parties who prepared written comments on the DEIR by date of their letters and their affiliation. This table also lists all individuals who testified at the DEIR public hearing on the adequacy of the GMP DEIR.
- o Chapter 4: This chapter presents "errata" from the DEIR that are amended either as a result of comments received through the DEIR public review process or for clarification. This chapter has been

organized according to the chapters of the DEIR. Those chapters without errata do not appear in Chapter 4.

- o Chapter 5: This chapter contains a bibliography of documents and personal communications used in preparing the FEIR.

Table 1-1. Commentors of the DEIR on the Draft
Growth Management Plan

<u>Written Comments</u>		
<u>Date of Letter</u>		<u>Commentor</u>
October 31, 1988		William Woolett, Jr. City Manager City of Irvine Community Development Department
November 3, 1988		Dennis J. O'Bryant Environmental Program Coordinator California Department of Conservation
November 10, 1988		John Ferraro Council President City Council of the City of Los Angeles
November 14, 1988		William Woolett, Jr. Acting Director of Community Development City of Irvine Community Development Department
		Roberta L. Soltz, Ph.D. Environmental Section Head The Metropolitan Water District of Southern California
November 16, 1988		Keith Turner Manager County of Ventura Resource Management Agency
November 17, 1988		Bob D. Simpson City Manager City of Anaheim
		Guy G. Visbal Chief, Transportation Planning Branch Caltrans, District 8
		Austin Sullivan Senior Planner City of Ontario Planning Department

Table 1-1. Continued

	Robert L. Braitman Executive Officer Ventura Local Agency Formation Commission
November 18, 1988	Monica Florian Vice President, Resource Entitlement The Irvine Company
	James C. Gratteau Head, Financial Management and Grants Administration Department County Sanitation Districts of Los Angeles County
	Michael M. Ruane Interim Director of Planning County of Orange Environmental Management Agency
	Ronald H. Smothers Director City of Pomona Development Department
	Richard M. Bobertz Senior Planner City of Redlands
	David N. Reem City Manager City of Santa Ana
	Brian W. Farris Senior Air Quality Specialist South Coast Air Quality Management District
	Kay Martin Manager County of Ventura Solid Waste Management Department
	David C. Nunenkamp Chief, Office of Permit Assistance California Office of Planning and Research

Table 1-1. Continued

November 22, 1988	F. Paul Dudley Director, Development Services Department City of Fullerton
December 30, 1988	Richard Deininger Mayor City of Corona

Oral Comments^a

SCAG's Energy and Environment Committee, October 27, 1988

Robert Farrell, Councilmember, Los Angeles *

Bob Kniesel, South Coast Air Quality Management District *

DEIR Public Hearing, November 3, 1988

Joel Rosen, City of Fullerton

Marsha Hednick, Los Angeles County Transportation Commission

Heather Iwamuro, Commuter Computer

Bryan Allen

DEIR Public Hearing, November 18, 1988

Bill Gayk, County of Orange

Margo Koss, Sierra Club, Angeles Chapter

Ken Bauer, Foxmoor Homeowners' Association, Thousand Oaks

Bill Wren, Ontario Chamber of Commerce *

Fred J. Fujioka, Minority Coalition for Responsible Growth

Austin E. Sullivan, City of Ontario

Joel Rosen, City of Fullerton

Doris Bradshaw, Private Citizen

Ontario Chamber of Commerce

DEIR Public Hearing, December 15, 1988

Robert Paternoster, City of Long Beach

Michael Hertel, Southern California Edison

Ron Bates, Orange County Division League of California Cities*

Bob Dunek, Orange County Division League of California Cities

Evelyn Heidelberg, California Council for Environmental and
Economic Balance

David Harrison, California Council for Environmental and
Economic Balance

Mark Futterman, Los Angeles American Institute of Architects

Table 1-1. Continued

Edric Guise, Building Industry Association of Southern California
David Cahn, Southern California Air Quality Alliance of CMA
Stephen Kaufman, Sierra Club
Beth Leeds - Environmental Protection Consultants
Carolyn Wood, Private Citizen
Marielle Leeds, Private Citizen
Stanley Hart, Sierra Club
Robert Getts, Western Oil and Gas Association
Kenneth Willis, Building Industry Association of Southern California
Bryan Allen, Private Citizen
Tom Nielsen, The Irvine Company

^a Commentors marked with an asterisk (*) commented on the GMP DEIR.

CHAPTER 2. CHANGES TO PROJECT DESCRIPTION AND REVISED SUMMARY TABLE

CHANGES TO THE PROJECT DESCRIPTION

The following minor adjustments have been made to the proposed project's (GMA-4 Modified Jobs/Housing) 2010 employment and housing totals in response to comments received on the Draft GMP.

Employment

Orange County's total has been adjusted upward by 1.6 percent to address its comment that Orange County's workers per household ratio is higher than the regional average and that the jobs/housing ratio does not reflect this fact. San Bernardino County's total has been decreased by 0.5 percent to address San Bernardino and Riverside Counties' comments that the mountain/desert projection is too high. Los Angeles County's projection was decreased by 0.4 percent to reduce commuting to that county.

	Original Projection (2010)	Adjusted Projection (2010)
Orange County	1,691,800	1,718,800
San Bernardino County	789,400	785,400
Los Angeles County	5,415,200	5,392,200

Housing

San Bernardino County's housing projection has been decreased 0.7 percent since the county has indicated that the housing forecast in the mountain portion is excessive. Riverside County's projection has been increased by 0.9 percent to reflect documented growth patterns in central Riverside County which indicate that the projected total for this area may have been low.

	Original Projection (2010)	Adjusted Projection (2010)
San Bernardino County	972,900	966,000
Riverside County	809,300	816,200

Jobs/Housing Ratio

	Original Projection (2010)	Adjusted Projection (2010)
Los Angeles County	1.37	1.36
Orange County	1.42	1.44
Urbanizing subregion	1.06	1.07
Mountain/desert subregion	0.67	0.65

No additional analysis of the proposed project has been conducted since these minor adjustments are not expected to affect the DEIR conclusions.

REVISED SUMMARY TABLE

Table 3-1, "Summary of Proposed Project Impacts and Mitigation Measures," is hereby amended to incorporate comments received during the DEIR public review period and corrections. Text in standard print indicates original text from the DEIR; text in italics indicates added language; text that has been overstruck is deleted language.

Mitigation Monitoring

Assembly Bill 3180, as passed by the California Legislature in the 1987-1988 session, added Section 21081.6 to the Public Resources Code as follows: a public agency shall adopt a reporting or monitoring program for the changes to the project which it has adopted or adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment. This mitigation monitoring program applies to mitigation measures adopted as part of EIRs or Negative Declarations. Mitigation monitoring will be required on all projects approved after December 31, 1988.

If SCAG certifies the EIR for the Draft GMP after December 31, 1988, SCAG will be required by state law to establish a mitigation monitoring program. The program should, at a minimum, identify the following: what department is responsible for monitoring the mitigation, what exactly is being monitored and how, what schedule is required to provide adequate monitoring, and what identifies the monitoring as complete.

Table 3-1. Summary of Proposed Project Impacts and Mitigation Measures

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
POPULATION, EMPLOYMENT, AND HOUSING	Net increase of 5.87 million persons, 2.67 million housing units, and 3.03 million jobs.	Refer to measures in this and other chapters; <i>under the following impact categories: population, employment, and housing; public services; transportation; air quality; noise; and ecological resources.</i>
	Proportional decline of the White population and growth of the Hispanic, Black, and Asian/other populations.	Local jurisdictions and other service providers should provide accessible and effective services to members of all ethnic groups in the population, particularly to those that have special needs (e.g., immigrants and lower-income households); and Local jurisdictions and community leaders should support efforts to increase the representation of minority groups among elected and appointed positions where such representation has been substantially lower than the proportion of such groups in the general population; and Local jurisdictions should implement RHNA and other programs that would increase housing opportunities for lower-income ethnic minority households, particularly in areas of the region outside Los Angeles County.
	Growth of the 65+ age group and decline of the 0-17 age group.	Local jurisdictions and other service providers should provide accessible and effective health care and social services to members of all age groups in the population, particularly to those that have special needs (e.g., immigrants, lower-income households, and the elderly); and Public agencies and private organizations should support or provide adequate public education, job training, housing, child care, and public assistance programs for children, families, and younger adults as needed.
	Decreased household size could increase the demand for housing and per capita housing costs and the demand for social services.	Local jurisdictions and service providers should improve and expand the supply of affordable housing, as called for in the RHNA, as well as social services, particularly for single-parent families and the elderly. Measures such as the following could be considered: o identify local housing needs and develop programs to address these needs in conjunction with nonprofit and for-profit developers. Objectives of such programs could include maintaining and improving existing subsidized and below-market-rate housing, constructing new below-market-rate units, providing financial and technical housing assistance to lower-income households, promoting redevelopment projects that improve or increase the stock of affordable housing, and acquiring or reserving sites for affordable housing projects (landbanking);

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
		<ul style="list-style-type: none"> o expand existing funding and develop new funding sources as needed to support housing programs; and o implement measures discussed in the "Health Care and Social Services" section of Chapter 6.
	Potential for decreased housing affordability.	Refer to measures identified immediately above.
	Growth in the share of employment in the services sector and decline of the share of employment in the manufacturing sector (as well as changes within the sector).	<p>Local jurisdictions, employers, and service agencies should implement measures to upgrade skill levels and adapt to changes in the economy, such as:</p> <ul style="list-style-type: none"> o job retraining of low-skilled workers for middle- and high-skilled jobs; and o job retraining of displaced workers due to structural changes in the economy; and o improving primary, secondary, and higher education programs to prepare the future labor force for future job opportunities; and o providing opportunities in small-to-medium sized businesses where most new job creation would occur.
	Continuing Increased jobs/housing imbalance over 1984 among sub-regions and counties.	<p>Subregional and local jurisdictions should implement strategies to improve the regional and subregional J/H imbalance. The following measures could be considered:</p> <ul style="list-style-type: none"> o in housing-poor areas, increase the amount and density of planned future residential development and/or reduce the amount of planned future commercial and industrial development through general plan revisions, zoning ordinances, and development incentives or conditions. Implementation of such measures could be a condition of consistency with regional plans and regulatory compliance; o in job-poor areas, increase the amount of planned future commercial and industrial development and/or reduce the amount of planned future residential development through general plan revisions and zoning ordinances, and development incentives or conditions. Implementation of such measures could be a condition of consistency with regional plans and regulatory compliance, as applicable;

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
		<ul style="list-style-type: none"> o impose developer fees on commercial and industrial projects in job-rich subregions to cover external costs associated with imbalanced development, and use fee revenues to build regional transportation infrastructure, mitigate air pollution effects of imbalanced growth, increase economic development programs in job-poor subareas, and facilitate housing development in job-rich subareas; o impose developer fees on housing projects in housing-rich subregions to cover external costs associated with imbalanced development and use fee revenues as described above; o revise and enforce air quality regulations (e.g., the South Coast Air Quality Management District New Source Review Rule and the Regional Air Standards Attainment Plan) to support J/H balance by restricting economic development in job-rich areas and favoring economic development in job-poor areas; o monitor J/H balance performance as a condition of "Reasonable Further Progress" under the 1988 AQMP and restrict the flow of federal funds to those areas which fail to comply; o encourage redevelopment projects in job-poor areas; o reallocate property and sales tax revenues from job-rich to job-poor areas by developing a intra-regional tax-revenue sharing system similar to the one established in the Minneapolis-St. Paul, Minnesota region since 1975; o implement growth management programs on a regionwide level by using local police powers to provide for more balanced growth (e.g., by phasing or structuring capital improvement programs so as to shape the pattern and timing of growth and by enacting ordinances requiring that growth be restricted as necessary to maintain minimum levels of service provided by local infrastructure systems); o expand and improve infrastructure system (e.g., transportation, wastewater, schools, and recreation facilities), giving highest priority to projects that would promote job growth in job-poor areas or would promote housing growth in housing-poor areas, limiting funding for projects that would generate employment growth in job-rich areas or would generate housing growth in housing-rich areas by jointly developing and funding a regional capital improvement program or establishing intergovernmental agreements; o locate new major job-inducing public facilities (e.g., universities, airports, and government service and trade centers) in job-poor areas;

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
2-7 LAND USE AND CULTURAL RESOURCES	Urbanization of approximately 650,000 acres and conversion of agricultural and open space lands	<ul style="list-style-type: none"> o encourage economic development in outlying job-poor areas by promoting the development of an extensive and active telecommunications network in the region that facilitates business location and development of those areas; o target limited state and federal economic development funds (where possible), with the highest priority being given to projects that promote job growth in job-poor areas (targeting jobs that match the skill levels of the unemployed and under-employed in those areas and assist residents of job-poor areas in relocating to areas with expanding job opportunities; o establish consistency with regional J/H balance objectives as a prerequisite or condition of incorporations approved by Local Agency Formation Commissions; and o implement measures that would further housing development objectives of the RHNA, including the increased use of redevelopment revenues for development of affordable housing.
	Incorporations and annexations	<p>None available. The following measures would partially reduce this impact, but not to a less-than-significant level.</p> <ul style="list-style-type: none"> o Refer to measures in this and other chapters; identified under the following impact categories: land use and cultural resources, ecological resources, and geology and hydrology. o Local jurisdictions should limit consider limiting the extent of the adverse effects of urbanization of open, vacant, undisturbed, or agricultural lands by encouraging infill development at increased densities in areas that are already urbanized or are designated for urbanization rather than development of rural or outlying areas; implementing land use controls that discourage development of prime agricultural land; and encouraging the preservation and development of open space areas and parks within highly urbanized areas. <p>Eligible voters, local jurisdictions, Local Agency Formation Commissions, and applicable regional and state agencies should authorize incorporations, annexations, and special district formations or changes that would result in the maximum feasible conservation of undeveloped land, the most efficient delivery of public services, and the least fiscal imbalance among all affected jurisdictions.</p>

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
2-8 PUBLIC SERVICES Water Supply	Possible damage, destruction, or removal of recorded and unrecorded cultural resources	<p>Local jurisdictions should require that the following measures be undertaken, prior to approving development, to protect cultural resources:</p> <ul style="list-style-type: none"> o map areas of prime cultural resource significance; o consult with the appropriate archeological or historical information center and clearinghouse (i.e., University of California at Los Angeles, University of California at Riverside, San Bernardino County Museum, or Imperial Valley College Museum) to identify known cultural resources and potential cultural resources that could be found on land proposed for development; and o implement an archeological field survey if a development area is identified as "sensitive." If the field survey identifies significant cultural resources, preservation and mitigation measures should be recommended.
	Regional water supply shortfall of <i>approximately</i> 1.2 million acre-feet (MAF) (15 12.6 percent shortfall) in 2010, of which 0.7 0.8 MAF (21 18.6 percent shortfall) would occur in the coastal plain subregion and 0.5 0.4 MAF (11 7.7 percent shortfall) in the outlying subregion	<p>The Metropolitan Water District of Southern California and other water providers in the region should increase dependable annual supplies at a regional level by 2010 to at least 8.0 <i>approximately</i> 9.5 MAF and make the fullest use of existing resources by implementing the following measures as needed:</p> <ul style="list-style-type: none"> o increase State Water Project (SWP) yields through implementation of a Coordinated Operation Agreement between the State and the U. S. Bureau of Reclamation; completion of various Delta facility capacity improvements, offstream storage programs, Central Valley Project and other SWP programs; and implementation of water transfer agreements between agricultural and urban SWP contractors; o obtain maximum use of Colorado River supplies; o store up to 3.0 MAF of surplus water in groundwater basins; and o make optimum use of existing resources and minimize adverse effects of supply shortfalls by local wastewater reclamation, groundwater protection, groundwater treatment, water conservation, surface water storage, and drought contingency planning projects.

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
Water Quality	Degradation of surface water, groundwater, and marine water quality	<p data-bbox="1224 248 2056 326">Local jurisdictions should link development phasing with phasing of new infrastructure, including adequate and effective drainage, wastewater, and waste disposal facilities; and</p> <p data-bbox="1224 354 2056 500">Under direction of the U. S. Environmental Protection Agency, the State Water Resources Control Board, Regional Water Quality Control Boards, and local and regional agencies should administer National Pollutant Discharge Elimination System permits for point dischargers and implement comprehensive basin plans for groundwater protection and treatment; and</p> <p data-bbox="1224 527 2056 673">Applicable jurisdictions and agencies should continue their influence and expand local coastal zone planning and management programs in conjunction with the State to prevent or reduce adverse effects on coastal water quality and to preserve or improve areas of special importance such as bays and estuaries; and</p> <p data-bbox="1224 701 2056 777">Local jurisdictions should implement regional air quality mitigation measures to reduce or eliminate the potential adverse water quality effects of lead fallout and acid precipitation; and</p> <p data-bbox="1224 805 2056 976">Local jurisdictions and water providers should mitigate groundwater quality problems by improving groundwater basin management as recommended in Regional Water Quality Control Board groundwater basin plans using various methods, including: conjunctive use of surface water, groundwater, and reusable wastewater; appropriate use of artificial recharge; and controls on development in recharge areas; and</p> <p data-bbox="1224 1003 2056 1278">Local jurisdictions should mitigate adverse effects of water pollution from nonpoint and other sources by implementing measures in SCAG's Areawide Waste Treatment Management Plan, including: implementing plans for containing and cleaning hazardous substance spills; strengthening and enforcing local management controls on construction site erosion and sediment control; implementing best management practices to control water pollution from agricultural areas; implementing improved streets, litter, catchbasin, inlet basins, and storm drain cleaning programs; and implementing measures to limit runoff and minimize peak flows from developing areas.</p>

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
Wastewater Treatment	<p>Increased daily wastewater treatment demand to <i>approximately</i> 2,171 million gallons, exceeding available treatment capacity as follows:</p> <p>San Bernardino County - 51 percent</p> <p>Riverside County - 45 percent</p> <p>Los Angeles County - 19 percent</p> <p>Imperial County - 15 percent</p> <p>Orange County - 5 percent</p>	<p>The 1974 <i>1979</i> Areawide Waste Treatment Management Plan (208) should be updated to be consistent with the CMP and AQMP; and</p> <p>To accommodate peak flows and to provide for a capacity reserve of approximately 10 percent, wastewater collection and treatment facilities should upgrade their facilities <i>may need to be upgraded</i> to the following 2010 capacity levels (percent over existing and funded capacity):</p> <ul style="list-style-type: none"> o Ventura County - 130 million gallons per day (MGD) (34) o Los Angeles County - 1,850 MGD (65) o Orange County - 510 MGD (47) o Riverside County - 210 MGD (106) o San Bernardino County - 300 MGD (108) o Imperial County - 23 MGD (64)
Solid Waste	<p>Depletion of existing landfill capacity by the following years:</p> <p>Ventura County - 1989</p> <p>San Bernardino County - 1990</p> <p>Orange County - 1995</p> <p>Los Angeles County - 1996</p> <p>Imperial County - 2008</p> <p>Riverside County - 2008</p>	<p>A comprehensive-size regional solid waste management plan should be developed; and <i>implemented by counties within the region, and this plan should include waste reduction, reuse, and recycling programs.</i></p> <p>The following counties, in their respective solid waste management plans, should require the following improvements, as identified by the California Waste Management Board:</p> <ul style="list-style-type: none"> o Ventura County - complete the major expansion of an existing landfill and develop a new landfill; o Los Angeles County - expand existing landfills, develop new landfills, and implement resource recovery projects; o Orange County - expand two existing landfills and develop a new landfill; o Riverside County - expand one landfill and develop two new landfills; o San Bernardino County - develop plans to expand one landfill; and o Imperial County - develop plans to expand landfills.

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
Hazardous Waste	Generation of <i>approximately 1.14-1.48 million tons of offsite hazardous waste</i> in 2010	<p>The Southern California Hazardous Waste Management Authority and each of its member counties should adopt and implement the 1989-Regional-Hazardous-Waste-Management-Plan <i>hazardous waste management plans that include waste reduction programs; and</i></p> <p>Hazardous waste management entities should increase the annual regional hazardous waste management capacity to 1.5 million tons by 2010 by establishing new disposal and treatment facilities. Local school districts should implement the following measures as needed:</p> <ul style="list-style-type: none"> o increase transportation of students from overcrowded schools to schools with surplus space; o increase the capacity of all existing facilities through extended (e.g., year-round) schedules or other means; o build at least <i>approximately 677</i> new schools by 2010, including 582 elementary and junior high schools and 95 senior high schools; o assess maximum allowable school impact fees as authorized by AB 2926 and use fee revenues to provide interim and permanent facilities; o if fee revenues and state funding are not sufficient to acquire school sites and provide new facilities, establish alternative financing mechanisms, such as community facility districts, to generate needed revenues or negotiate agreements that provide for site dedication and/or school construction by private parties; o hire additional qualified administrative, teaching, and support staff, including at least 31,000 new teachers; and o provide educational programs that meet the educational needs of all students, particularly those whose English speaking ability is limited or who are otherwise disadvantaged.
Schools	Demand for <i>approximately 677 additional schools and 31,000 additional teachers</i>	

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
Law Enforcement	Need for at least <i>approximately</i> 11,430 additional police officers and sheriffs and additional facilities (above 1984 levels)	<p>Law enforcement entities should provide needed police personnel, facilities, and equipment, as required by new development, by implementing the following measures, as needed:</p> <ul style="list-style-type: none"> o implement programs to reduce the crime rate, including drug and gang prevention programs and education, job training, and community activities for youth and young adults; o place greater reliance on developers to provide needed services and facilities; o achieve better efficiency in the delivery of police protection services and use of facilities through consolidation of services, better use of underutilized facilities, and redefinition of service district boundaries to achieve better efficiencies of scale; o use new technologies and policies that increase system efficiencies and reduce demands; o require that services be contracted to the private sector, such as private surveillance, in those instances where they can be provided more efficiently and at less cost; o promote greater responsibility for nongovernmental provision of certain services or facilities at the neighborhood or homeowner association level; and o require that development be phased according to the availability of adequate public services and facilities.
Fire Protection	Need for at least <i>approximately</i> 7,100-10,970 additional fire protection personnel and additional facilities (above 1977 staffing level)	<p>Fire protection entities should provide needed fire personnel, facilities, and equipment, as required by new development, by implementing the following measures, as needed:</p> <ul style="list-style-type: none"> o reduce fire protection demands and costs by requiring adequate emergency access, applying land use restrictions in high-risk areas and performance standards on high-risk activities, and incorporating standard fire prevention features into new development (such as automatic sprinklers); o implement fire safety education programs; o provide specialized training for fire personnel as needed;

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
Health Care and Social Services	Increased need for health care services and facilities	<ul style="list-style-type: none"> o achieve better efficiency in the delivery of fire protection services and use of facilities through consolidation of services, better use of underutilized facilities, and redefinition of service district boundaries to achieve better efficiencies of scale; o use new technologies and policies that increase system efficiencies and reduce demands; o promote greater responsibility for nongovernmental provision of certain services or facilities at the neighborhood or homeowner association level; and o require that development be phased according to the availability of adequate public services and facilities.
		Public and private health service providers should expand staff and facilities as needed. Facilities operating by 2010 should include at least 500 new skilled nursing facilities and additional hospitals, intermediate care facilities, and clinics. Providers should improve salaries and working conditions to attract and retain a sufficient number of skilled nurses and other medical personnel; and
		Public agencies and private organizations should expand subsidized health care services and provide more comprehensive health insurance coverage to those who cannot afford the costs of services, particularly to families with young children, the elderly, and those with acute health care needs; and
		Health service providers should develop and expand innovative, affordable, and cost-effective alternatives such as preventative care, adult day care, and home health care services.
	Increased need for public assistance	Local, state and federal government agencies should increase the efficiency of the Food Stamps and MediCal programs to better serve those in need; and
		Public agencies and private organizations should reduce the level of future demand for public assistance by jointly developing and implementing innovative and cost-effective education, job training, job placement, child care, and family support programs.

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
	Increased need for other social services	<p>Employers in the region should participate directly or indirectly in providing or supporting child care services; and</p> <p>Service providers should develop and expand innovative, affordable, and cost-effective programs for delivering social services to the elderly, children, and the general population.</p>
Energy	Increased electricity and natural gas demand of 41,500 approximately 60,740 Gigawatt-hours (Gwh) and 260 486 billion cubic feet (Bcf) per year, respectively	<p>Utilities, local jurisdictions, and residents should participate in implementation of the following measures, as needed:</p> <ul style="list-style-type: none"> o reduce overall future electricity demand in the region by 20 percent or 22,600 Gwh/yr projected 2010 regional electricity demand by approximately 30 percent through energy conservation; o reduce overall future natural gas demand in the region by 15 percent or 111.62 Bcf/yr projected 2010 regional natural gas demand by approximately 29 percent through energy conservation; o reduce projected 2010 regional residential, commercial, and industrial sector energy demand for electricity and natural gas as needed to accomplish the energy conservation objectives indicated above; o reduce total annual residential sector demand by 25 percent; or 8,500 Gwh and 73.22 Bcf/yr; by applying California Title 24 building standards and state and federal appliance efficiency standards to all new construction; requiring retrofitting of existing buildings (e.g., weatherstripping and insulation) as feasible; shifting consumption to off-peak hours by developing and implementing residential load management standards and rate adjustments; o reduce total annual commercial sector demand by 30 percent; or 10,000 Gwh and 23.14 Bcf per year; by implementing Title 24 nonresidential building standards to all new construction; installing cost-effective conservation measures in existing commercial buildings; and developing and implementing lighting and commercial appliance efficiency standards; o reduce total annual industrial sector demand by 5 percent or 2,600 Gwh and 15.22 Bcf per year by implementing increased motor and operation and control efficiency standards; installing cost-effective energy conservation equipment on industrial facilities (e.g., boilers), and increasing agricultural pumping efficiency;

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
		<ul style="list-style-type: none"> o provide incentives for cleaner and less energy-intensive industrial development and promote cogeneration and other practices to reduce manufacturing and industrial energy consumption; o increase the use of renewable and alternative energy sources (e.g., wind and geothermal) that generally are less capital-intensive and have shorter development lead times than conventional sources; and o apply measures recommended in the AQMP that would reduce overall in the generation of fossil fuel-based electricity within the air basin.
	Increased annual motor fuel demand of approximately 250-768 million gallons per year	<p>Transportation agencies, local jurisdictions, employers, residents, and the automobile industry should participate in the implementation of the following measures, <i>as needed</i>:</p> <ul style="list-style-type: none"> o increase average vehicle fuel economy, particularly that of light-duty passenger vehicles, through technological change; o increase the use of vehicles with greater fuel economy through increased fuel costs, taxes, or other economic incentives; o increase the use of alternative or renewable energy sources (e.g., alcohol or other liquid fuels from biomass, hydrogen produced from solar or wind power, or the direct use of electricity generated by solar or wind power); o plan future growth so as to minimize transportation energy use by promoting mixed-use development, public transit, nonmotorized travel, and beneficial social or technological developments (e.g., telecommunications); and o reduce projected levels of future traffic congestion by implementing the preferred RMP strategy, as described in Chapter 7.

^a The CEQA finding in the Regional Mobility Plan EIR is "beneficial" rather than "less than significant after mitigation" since the Regional Mobility Plan EIR considers the Regional Mobility Plan as the proposed project, whereas the GMP EIR considers the Regional Mobility Plan as mitigation.

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
TRANSPORTATION ^a	<p>42 percent increase in total regional person-trips.</p> <p>Little change in the proportion of intracounty home-work trips to total home-work trips regionally or</p> <p>64 percent increase in home-work trips from Riverside and San Bernardino Counties to Los Angeles County; 80 percent increase from Riverside and San Bernardino Counties to Orange County; 137 percent increase between Riverside and San Bernardino Counties</p> <p>6 percent increase in average trip time and an 8 percent increase in average trip length</p> <p>29 percent of the hours of travel would be spent traveling at less-than-free-flow speeds, compared to 10 percent in 1984</p> <p>57 percent increase in regional vehicles miles traveled (VMT) with a 231 percent increase in VMT in Riverside and San Bernardino Counties</p> <p>48 percent increase in miles of congestion during the a.m. and p.m. peak hours with 79 percent of the congestion in Los Angeles and Orange Counties</p> <p>Decrease in the transit mode split from 6.6 percent to 5.1 percent</p>	<p>None available to reduce the level of congestion and amount of delay to that experienced in 1984. The following mitigation measure would partially reduce these impacts, but not to a less than significant level:</p> <p>o Implement the Regional Mobility Plan preferred strategy within counties which calls for:</p> <p>o facility development with 875 1,857 lane-miles of new roadway construction, 983 1,251 lane-miles of new high occupancy vehicle (HOV) capacity; 397 miles of new rapid transit systems; and 112 new park-and-ride lots; feeder and local circulation transit development to support new and expanded line have transit in identified corridors connecting all activity centers in the metropolitan portion of the region;</p> <p>o implementation of jobs-housing balance policies to shift 9 percent of new jobs to job-poor areas and 4.5 percent of new housing to housing-poor areas;</p> <p>o demand management through the South Coast Air Quality Management District's Regulation XV, modified work weeks, employment center carpool goals, increased transit work trips, and extended peak periods; and</p> <p>o system management of the existing and proposed roadway system through programs such as "SMART Freeway" technology; CALLBOX service authorities; and expansion of modal separation programs, ramp metering, HOV ramp-meter-bypass installations, synchronized signals, and pavement management programs.</p>

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
AIR QUALITY ^b	<p>Exceedance of Draft 1988 Air Quality Management Plan (AQMP) target emissions levels (amount of emissions that could be produced in the South Coast Air Basin [SCAB] without violating federal and state air quality standards) as identified by the South Coast Air Management District (1988d). Target levels would be exceeded by the following amounts:</p> <ul style="list-style-type: none"> o reactive organic gases (ROG): 400-500 percent, o carbon monoxide (CO): 20-25 percent, o nitrogen oxide; (NOx): 250-350 percent, o sulfur oxides (SOx): 100-300 percent, and o inhalable particulate matter: 60-80 percent. <p>Exceedance of the 1982 Air Quality Management Plan (AQMP) 2000 emissions estimates, which assume implementation of recommended control measures, by the following amounts:</p> <ul style="list-style-type: none"> o ROG: 75 percent, o CO: 150-175 percent, o NOx: 75-100 percent, o SOx: up to 100 percent, and o inhalable particulate matter: 50-75 percent. 	<p>None available for all-pollutants <i>ROG and NOx if the technological breakthroughs associated with the AQMP's Tier III control measures do not become a reality.</i></p> <p>The following measures would partially reduce this impact, but not to less than significant for all-pollutants:</p> <ul style="list-style-type: none"> o Implement the transportation measures <i>(Strategy 3) Regional Mobility Plan preferred strategy</i> discussed in Chapter 7; and o Implement the <i>feasible</i> stationary, area, and mobile source control measures identified in the AQMP. <p>Implementation of these measures may reduce CO, SOx, and inhalable particulate matter emissions at or below target levels.</p> <p><i>For CO, SOx, and inhalable particulate matter, the following measures would reduce impacts to less than significant:</i></p> <ul style="list-style-type: none"> o Implement the <i>Regional Mobility Plan preferred strategy</i> discussed in Chapter 7; and o Implement the <i>feasible</i> stationary, area, and mobile source control measures identified in the AQMP. <p>None available for all-pollutants <i>CO.</i></p> <p>The following measures would partially reduce this impact, but not to less than significant for all-pollutants:</p> <ul style="list-style-type: none"> o Implement the transportation measures <i>(Strategy 3) Regional Mobility Plan preferred strategy</i> discussed in Chapter 7, and o Implement the <i>feasible</i> stationary, area, and mobile source control measures identified in the AQMP. <p>For implementation of these measures may reduce ROG, NOx, inhalable particulate matter, and SOx emissions, at or below the 1982 AQMP levels, the following measures would reduce impacts to less than significant:</p> <ul style="list-style-type: none"> o Implement the <i>Regional Mobility Plan preferred strategy</i> discussed in Chapter 7; and o Implement the <i>feasible</i> stationary, area, and mobile source control measures identified in the AQMP.

^b The CEQA finding in the Regional Mobility Plan EIR is "beneficial" rather than "less than significant after mitigation" since the Regional Mobility Plan EIR considers the Regional Mobility Plan as the proposed project, whereas the GMP EIR considers the Regional Mobility Plan as mitigation.

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
NOISE	Exceedance of normally acceptable noise levels.	<p>None available at some locations.</p> <p>The following mitigation measure would reduce this impact to a less-than-significant level at some locations:</p> <ul style="list-style-type: none"> o Local and state jurisdictions should require needed noise abatement measures (such as construction of noise barriers and reduction of interior noise levels through building and site design features) to attain noise levels compatible with affected land uses; such measures should be designed based on an acoustical analysis by a qualified acoustical engineer.
ECOLOGICAL RESOURCES	Habitat loss from encroaching development	<p>Local jurisdictions in the SCAG region, in their respective general plans, should adopt <i>consider adopting</i> policies with the following objectives:</p> <ul style="list-style-type: none"> o conduct detailed inventories of biological resources that need protection to preserve natural diversity at the local and regional level; o preserve unique natural areas; o preserve prime agricultural lands, especially where such lands are connected to lands permanently set aside as conservation or open space lands; o avoid significant habitats as a prerequisite for future development plans; o improve the identification and implementation of mitigation measures for potentially impacted biological resources at the local level; and o develop funding mechanisms to purchase and dedicate important biological resource lands as reserves and preserves. <p>SCAG should develop <i>consider developing</i> a comprehensive regional plan to protect biological resources.</p>
	Fragmentation of remaining habitats	<p>Local jurisdictions in the SCAG region, in their respective general plans, should adopt <i>consider adopting</i> policies with the following objectives:</p> <ul style="list-style-type: none"> o establish buffers where wildlands meet new development to form a transition area and provide some space between development and wildlands that need protection; o establish corridors between remnant habitat areas or between remnants and large wildland parcels in general and specific plans and in local, subregional, and regional conservation and open space planning; and

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
	Loss of riverine, riparian, and wetland habitats	<ul style="list-style-type: none"> o identify particular areas where fragmentation may be a problem and develop measures to provide or maintain corridors, translocate individual animals if numbers become too low, and provide buffers. Local jurisdictions in the SCAG region, in their respective general plans, should adopt <i>consider adopting</i> policies with the following objectives: <ul style="list-style-type: none"> o use open space and conservation designation to protect riverine, riparian, and freshwater wetlands from development; o promote naturalized flood control channels such as those promoted under the California Department of Water Resources Urban Creeks Program; o support the design of flood control channels to accommodate flood flows in vegetated channels; o require all projects that impact riverine, riparian, and wetlands resources to mitigate in-kind for any habitat impacts; o support local, subregional, and regional mitigation banks that create or restore degraded riparian or wetland habitats; and o facilitate coordination with U. S. Army Corps of Engineers on Section 10/404 permits (dredged/discharge fill material) and with the California Department of Fish and Game on Fish and Game Code Section 1601-3 agreements (channel modifications) to afford maximum habitat protection and coordinated creation and restoration planning.
	Loss of individuals and habitat for rare, threatened, and endangered species	<ul style="list-style-type: none"> Local jurisdictions in the SCAG region, in their respective general plans, should adopt <i>consider adopting</i> policies with the following objectives: <ul style="list-style-type: none"> o require surveys as part of the planning process for all species that are candidate, proposed, or listed under the federal and state Endangered Species Acts; o require adequate mitigation for any development that would have an adverse impact on listed species; o encourage mitigation activities to be monitored and ensure that provisions be made in entitlements for successful implementation; o encourage enhancement of listed species habitats through conservation and open space plans to protect species whose numbers are becoming so low they soon will be listed;

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
		<ul style="list-style-type: none"> o recognize the development of Habitat Conservation Plans (HCP) (Section 10 of the federal Endangered Species Act) or their equivalent as special land use plans that incorporate large areas and many ownerships in a cooperative plan to support a listed species; and o encourage the development of public and private mitigation banks that incorporate large areas where habitats can be created or enhanced to compensate for habitat lost to development.
	Loss of habitats from wildlands fire and fire suppression	Local jurisdictions in the SCAG region should support fire hazard mitigation planning that seeks to keep fuel loads suppressed without removing all the vegetation.
	Recreational impacts in desert, mountains, and coastal areas	<p>Local jurisdictions in the SCAG region should adopt <i>consider adopting</i> policies with the following objectives:</p> <ul style="list-style-type: none"> o coordinate local park planning with the appropriate state departments and federal agencies; o support adequate funding for law enforcement personnel to protect reserve, preserves, parks, and other public lands; o support a wide range of facilities from intensive activity park sites to wilderness areas; and o use habitat and species surveys discussed earlier under mitigation for potential habitat and listed species losses to identify areas to be avoided for recreational activities and facilities.
	Reduced tree vigor and increased tree mortality from air pollution	<p>Local jurisdiction in the SCAG region should adopt <i>consider adopting</i> policies with the following objectives:</p> <ul style="list-style-type: none"> o support continued research to find improved strains of coniferous species that are more tolerant of pollutants; and o implement the air pollution mitigation measures identified by the <i>Draft 1988 AQMP</i>.
	Effects of pollutants on near shore ocean waters	Refer to the water quality measures for coastal areas identified in Chapter 6.

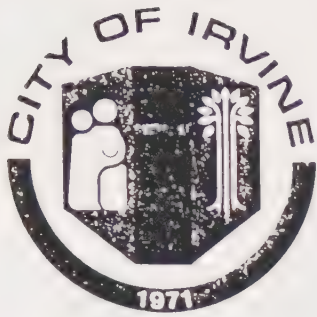
Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
GEOLOGY AND HYDROLOGY		
Seismicity	Increased exposure to seismic hazards	<p>None available. The following measures would partially reduce this impact, but not to less than significant:</p> <ul style="list-style-type: none"> o Local jurisdictions within the SCAG region should continue to: <ul style="list-style-type: none"> - implement the Alquist-Priolo Act by identifying areas of severe seismic hazard and avoid them as development areas; - develop disaster relief programs to serve the entire SCAG region and improve interjurisdictional coordination; - institute programs to identify those structures throughout the SCAG region that are especially vulnerable to earthquakes and endeavor to repair or replace dangerously vulnerable building; and - comply strictly with ordinances and regulations governing construction of homes, buildings, and facilities in seismically active areas.
Aggregate Resources	Depletion of Portland Cement Concrete (PCC) aggregate resources would increase construction costs	<p>Local jurisdictions in the SCAG region should continue to comply with the Surface Mining and Reclamation Act, which requires them to incorporate mineral resource management policies into their general plans, such as the implementation of land use planning strategies that avoid future development on lands containing significant PCC grade aggregate resources and that site compatible uses adjacent to aggregate resource sites and along mine access routes.</p>
Hydrology	Potential aggravation of landslide and erosion conditions in hilly and mountainous areas	<p>Local jurisdictions in the SCAG region, in their respective general plans, should continue to require the following:</p> <ul style="list-style-type: none"> o inspection of slopes above and below proposed developments by a geotechnical engineer prior to grading and following fine grading of construction sites and adherence to recommendations for the elimination of hazardous soil and slope conditions; o implementation of fire prevention measures; o revegetation following fire damage to reduce the amount of rock, soil, and other debris that would flow downslope during rainfall events by allowing vegetation to anchor soils and detain runoff; and

Table 3-1. Continued

Impact Category	Significant Impacts	Mitigation Measures Necessary to Reduce Significant Impacts to Less than Significant
	Potential exposure of new development in desert areas to flash floods	<ul style="list-style-type: none"> o installation and maintenance of sedimentation basins in appropriate locations along drainages to capture sediment, mudflows, and landslides before they reach homes and other flood damageable property. <p>Local jurisdictions in the SCAG region, in their respective general plans, should continue to:</p> <ul style="list-style-type: none"> o identify flash flood wash areas and other geologic formations indicating past flooding activity, as determined by a hydrologist or hydraulic engineer experienced with flash flood conditions; o require avoidance of future development in flash flood susceptible areas; o require that information concerning flood hazard potential be posted at all access points to parks and recreation areas, in the event of rainfall; and o require installation of adequate flood control structures to protect existing and future development from flash flood hazards and design of flood control structures by a registered professional engineer experienced in the design of flood control and flood protection structures for flash flood runoff events.

CHAPTER 3. COMMENTS AND RESPONSES TO COMMENTS



Community Development Department

City of Irvine, 17200 Jamboree Road, P.O. Box 19575, Irvine, California 92713 (714) 660-3600

CITY OF IRVINE
PLANNING

NOV 03 1988

SOUTHERN CALIFORNIA ASS'N
OF GOVERNMENTS

October 31, 1988

Mr. Mark Pisano, Executive Director
Southern California Association of Governments
600 S. Commonwealth
Suite 1000
Los Angeles, CA 90005


Dear Mr. Pisano:

Thank you for the opportunity to review and comment on the Southern California Association of Governments' (SCAG) draft plan and draft environmental impact report (DEIR) on Regional Growth Management. The City of Irvine is concerned that the comment period is not sufficient and requests SCAG to grant an extension for comments to February 1, 1989.

The City is concerned that the Growth Management Plan will have severe impacts on the future of the region. It also will impact other regional plans, such as the Regional Mobility Plan and Air Quality Management Plan, which are also currently in draft form. The complex interrelationship of these plans can not be overstated. It is important that they be evaluated together and in a thorough manner which dictates more time than the allotted period allows.

The City of Irvine, like SCAG, is concerned about the manner in which the future growth of the region is controlled. Your cooperation is appreciated and the City, again, thanks you for the opportunity to comment. If you have any questions, please call Eve Somjen, Acting Principal Planner, at (714) 660-3647.

Sincerely,


WILLIAM WOOLLETT, JR.
City Manager

WW/SR/kh

cc: Don Griffen, President, SCAG
Viviane Doche-Boubs, SCAG
Paul Hatanaka, SCAG
Delaine Winkler, SCAG

disk:LPisano

RESPONSES TO THE COMMENTS OF THE CITY OF IRVINE
COMMUNITY DEVELOPMENT DEPARTMENT

1. On December 15, 1988, SCAG's Executive Committee postponed certifying the FEIRs on SCAG's Draft GMP, Draft Regional Mobility Plan (RMP), and on SCAG's and the Southern California Air Quality Management District's (SCAQMD's) Draft Air Quality Management Plan (AQMP). On December 16, 1988, the SCAQMD Board postponed certifying the FEIR on the Draft AQMP. Accordingly, the review period on the Draft GMP DEIR was extended by 47 days to January 31, 1989.

Once the AQMP is adopted, the SCAQMD will establish task forces to discuss several unresolved issues, including growth management, socio-economic impacts, alternative fuels, monitoring implementation, and regional mobility. This process will lead to issue-specific recommendations to the SCAQMD Board at the end of a 9- to 12-month period. In turn, those recommendations could necessitate additional project-specific environmental documents and amendments to the plans. Therefore, it is important to recognize that the AQMP, GMP, and RMP are all ongoing planning programs.

Memorandum

To : Dr. Gordon F. Snow
Assistant Secretary for Resources

Date : NOV 03 1988

Mr. Paul Hatanaka
Southern California Association of Governments
600 S. Commonwealth Avenue, Suite 1000
Los Angeles, CA 90005

Subject: Draft Environmental
Impact Report for
SCAG's 1988 Regional
Growth Management
Plan,
SCH# 88062924

From : Department of Conservation—Office of the Director

The Department of Conservation's Division of Mines and Geology (DMG) has reviewed Southern California Association of Governments' (SCAG) 1988 Regional Growth Management Plan. We offer the following comments.

The Draft Environmental Impact Report (EIR) makes reference to our Special Publication 60, "Earthquake Planning scenario for a magnitude 8.3 earthquake on the San Andreas fault in southern California". Although you may be aware of it, we have recently published a "Planning Scenario for a Major Earthquake on the Newport-Inglewood Fault Zone", Special Publication 99. We recommend use of this report in the preparation of the Plan's Earthquake Contingency and the Final EIR. 2

If you have any questions regarding these comments, please contact Zoe McCrea, Division of Mines and Geology Environmental Review Officer, at (916) 322-2562.



Dennis J. O'Bryant
Environmental Program Coordinator

DJO:ZM:it
0350q/0011q

cc: Zoe McCrea, Division of Mines and Geology
Richard B. Saul, Division of Mines and Geology

RESPONSES TO THE COMMENTS OF THE CALIFORNIA
DEPARTMENT OF CONSERVATION

2. Page 11-2 of the DEIR describes scenarios for movement along the Newport-Inglewood fault zone based on an article by the U. S. Geological Survey. Reference to California Division of Mines and Geology Special Publication 99 is hereby incorporated into the EIR.



MLT009

CITY COUNCIL OF THE CITY OF LOS ANGELES

OFFICE OF THE PRESIDENT

JOHN FERRARO

COUNCILMAN 4TH DISTRICT

M-30, CITY HALL
LOS ANGELES, CA 90012
(213) 485-3337

November 10, 1988

Mark Pisano
Executive Director
Southern California Association of Governments
600 South Commonwealth Avenue, Suite 1000
Los Angeles, California 90005

Dear Mr. Pisano:

We have recently received the Southern California Association of Governments' Draft Growth Management Plan and Environmental Impact Report. The City feels that this report could have a major impact on the direction of future growth in Southern California and consequently, welcome the opportunity to comment on the report. However, because of the complexity of this subject and the great amount of data contained in the Plan, we would request that the comment period be extended for an additional two weeks from the November 18 deadline to provide adequate time to digest and respond to the report.

Thank you for your consideration of this request. I can assure you that you will hear from us in the near future.

Sincerely,

John Ferraro
John Ferraro
Council President

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NOV 15 1988

SOUTHERN CALIFORNIA ASS'N.
OF GOVERNMENTS

RESPONSES TO THE COMMENTS OF THE CITY COUNCIL
OF THE CITY OF LOS ANGELES

3. See Response 1.



City of Irvine, 17200 Jamboree Road, P.O. Box 19575, Irvine, California 92713 (714) 660-3600

November 14, 1988

NOV 18 1988

30th Anniversary
of the City of Irvine

Ms. Vivian Doche-Boulos
Southern California Association of Governments
600 S. Commonwealth Ave., Suite 1000
Los Angeles, CA 90005

SUBJECT: DRAFT 1988 GROWTH MANAGEMENT PLAN AND ENVIRONMENTAL
IMPACT REPORT

Dear Ms. Doche-Boulos:

Thank you for providing the opportunity to review the Draft 1988 Growth Management Plan and the corresponding Draft Environmental Impact Report. The City of Irvine has three major concerns about the draft plan. In addition, specific comments on the documents and their appendices are attached.

First, we remain concerned about the lack of an organized effort by the Southern California Association of Governments (SCAG) and the South Coast Air Quality Management District (SCAQMD) to include the affected public agencies and members of the private sector in the policy development. The successful implementation of all the proposed regional plans requires the cooperation of all the affected bodies. We suggest that a process be developed to reach a consensus on control measures and to establish implementation mechanisms prior to adoption of the plans. 4.1

Furthermore, we are concerned that there is no detailed documentation addressing the complex interrelationship of all the SCAG regional plans with the SCAQMD's Air Quality Management Plan. References to the other documents are made in each plan, and it is clear that for complete attainment of the goals and objectives, each of the component plans must be adopted, but an explanation of the interrelationships and dependencies is a necessity for a complete understanding. Specifically, the discussion should detail the responsibilities and authority to guarantee the successful implementation of the plans. 4.2

Finally, the timing of all the plans remains a concern to the City. It has been difficult to acquire all of the related plans. The Growth Management Plan has only recently become available. With respect to the extensive documentation of these plans and the magnitude of their impacts, the review periods that have been provided are clearly insufficient. We again request that SCAG consider extending the deadline for comments until February 1, 1989. 5

The City of Irvine is concerned about the issues addressed by the Growth Management Plan, such as air quality and traffic congestion, and would like to lend its support to any proposals which can successfully make a positive impact on these issues. 6

Thank you again for this opportunity to comment and for your cooperation. If you have any questions, please contact Eve Somjen, Acting Principal Planner, at (714) 660-3647.

Sincerely,


WILLIAM WOOLLETT, JR.

Acting Director of Community Development

cc: Eve Somjen, Acting Principal Planner
Gail Shiimoto-Loehr, Principal Transportation Analyst
Diana Blaisure, Associate Planner

WW/SR:camG/sr-vivian

CITY OF IRVINE
COMMENTS ON THE 1988 DRAFT SCAG GROWTH MANAGEMENT PLAN
AND DRAFT ENVIRONMENTAL IMPACT REPORT

<u>p. I-1:</u>	The discussion on the purposes of the GMP should include discussion on how the plan is tied into the AQMP. Also, why and how are the year 2010 projections for the GMP being folded into the AQMP, which has a horizon year of 2007.	7.1
<u>p. I-3:</u>	The discussion refers to growth management systems in place. Examples and explanations of these systems and how the Growth Management Plan is a "restructuring" of these systems would be useful.	7.2
<u>p. II-5:</u>	Figure II-3 does not demonstrate the region's housing totals. Should the reference have been to Figure II-4?	7.3
<u>p. II-5:</u>	Are the housing unit totals in Figure II-4 total units or new units?	7.4
<u>p. II-5:</u>	Perhaps a line graph demonstrating total housing trends and projections would be useful.	7.5
<u>p. II-6:</u>	In discussing the expected increase in personal income over the next two decades, were inflation trends considered? Perhaps focusing on disposable income would be more appropriate.	7.6
<u>p. II-6:</u>	What assumptions suggest Hispanic household size will decrease?	7.7
<u>p. II-6:</u>	What are the distinctions between low, moderate, and high with respect to wages and job skills? Can examples of each be provided?	7.8
<u>p. II-8&9:</u>	For comparison purposes, the growth rates and other information should be presented similarly for each county.	7.9
<u>p. III-3:</u>	In discussing the necessary number of lane miles, is the total 4,181 to 6,000 lane-miles in addition to existing lane miles or does it include the existing lanes?	7.10
<u>p. III-3:</u>	What is a modest increase in transit ridership?	7.11
<u>p. IV-2:</u>	Provide additional discussion on the analysis that was conducted to determine that traffic congestion is related to unbalanced distribution of jobs and housing. How much of the congestion is attributable to the imbalance?	7.12

<u>p. IV-5:</u>	To encourage the balance of type of job with the price of housing may segregate some areas by economic status, a policy SCAG wants to avoid.	7.13
<u>p. VII-1:</u>	The stated intent of GMA-4 Modified J/H Balance Forecast is to adjust the most recent trend projection data, and then to adjust the housing and employment to achieve the levels of mobility and air quality that are comparable to GMA-2. Are the GMA-2 air quality levels the same as those targeted for in the AQMP?	7.14
<u>p. VII-2:</u>	Are the regional impacts of GMA-4 Modified realistic, considering that indicators such as the match between the price of housing and the household income of the employees in the area could not be included in the measurement of jobs and housing balance?	7.15
<u>p. VIII-1:</u>	Much of the implementation process assumes voluntary participation of local jurisdictions. What will assure this will happen and what actions will SCAG take if local jurisdictions do not comply?	7.16
<u>p. VIII-1:</u>	Have jurisdictions with jobs/housing balance objectives adopted them to reduce commute times and improve air quality or for more local reasons?	7.17
<u>p. VIII-2:</u>	Since implementation of the GMP is envisioned to be voluntary, what actions will be taken to ensure that all local jurisdictions will be represented on the Subregional Entities? These groups, with SCAG's assistance, will be developing the jobs/housing five-year targets for each jurisdiction; thus it seems imperative that each local entity be represented.	7.18
<u>p. VIII-3:</u>	The timeline for adoption of a General Plan Amendment may be unrealistic.	7.19
<u>p. VIII-4:</u>	What are "balance-promoting infrastructure improvements?" Provide some examples so that the reader can fully understand this concept.	7.20
<u>p. VIII-4:</u>	For projects that exceed either the housing or employment targets, one identified option is to require the developer to provide housing or job opportunities in another area within the sub-region. How would this strategy be monitored to ensure that certain areas are not always the target of the mitigation measures?	7.21

<u>p. A1-1:</u>	Exactions of regional scale, as discussed, will only be beneficial if they are adopted on a regional scale. This requires the cooperation of <u>all</u> jurisdictions.	7.22
<u>p. A1-2:</u>	The local police powers measures strategy does not address the issue of housing cost. Although local jurisdictions may be able to promote housing construction in housing-poor/job-rich areas, discussion is absent regarding how to handle the cost issue.	7.23
	When and how will it be decided which strategies and techniques (as outlined in Appendices 1 and 2) will be encouraged by SCAG? Are all of them options that should be considered as part of the GMP?	7.24
	Sedway Cooke Associates' discussion on conflict resolution procedure between local jurisdictions, counties, and SCAG is much appreciated.	
<u>p. A1-4:</u>	Who will establish regional priorities for building the infrastructure necessary to support the projected job growth?	7.25
	Also, are local jurisdictions being asked to implement strategy 4b? The GMP states that funds for projects are to be made available only to a level that would foster the amount of employment growth shown in regional targets for job-rich areas.	7.26
	A number of the proposed Infrastructure Funding strategies entail setting regional priorities for various improvement programs and projects. What process or system is envisioned by SCAG that will allow all of the affected agencies to provide input as well as a system that will resolve conflicting priorities?	7.27
<u>p. A1-5:</u>	Strategy 5, the incentive measure of eliminating or reducing developer fees, contradicts the exaction strategy discussed on page A1-1. In what development situations would local jurisdictions provide incentives and in what situations would they charge fees?	7.28
<u>p. A2-3:</u>	Sedway Cooke's report suggests as a planning strategy adherence to the Regional Growth Management Plan. If this is to be, the GMP should clearly discuss requirements and actions necessary of local governments.	7.29

<u>p. A2-5:</u>	Would not formal project review by a regional authority slow the processing of some development projects which counteracts streamlining review as suggested in technique #6 in Appendix 1?	7.30
<u>p. A2-7:</u>	Although more dense development patterns to increase job and housing proximity may help to keep trips at a local level rather than on the regional system, it may also work to exacerbate local traffic congestion.	7.31
<u>p. A2-8:</u>	Currently, affordable housing costs to potential residents are based on the county median. Will a regional median be calculated and used rather than a different county median?	7.32
<u>p. A2-24:</u>	The Growth Management Quota System -- which would restrict residential growth--seems as if it would increase vehicle miles travelled unless all jurisdictions simultaneously implemented and enforced this policy. If not, affordable housing could be built in less developed areas where less expensive land is available.	7.33
	Since so many of the job/housing balance strategies require cooperation among most levels of government, but are also voluntary, how will consistency throughout the region be established and maintained?	7.34
	In the DEIR on pp. 7-6 and 7-7, no LA to Orange intercounty home-work trips appear. Is this amount insignificant? Are none projected for 2010?	8
	The City has also submitted comments to SCAG on the Regional Mobility Plan. Our concerns regarding the region's future transportation system and funding and SCAG's preferred RMP strategy apply to the GMP DEIR as well.	9

camG/sr-gmp

RESPONSES TO THE COMMENTS OF THE CITY OF IRVINE
COMMUNITY DEVELOPMENT DEPARTMENT

4. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
5. See Response 1.
6. Comment noted.
7. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
8. Los Angeles to Orange intercounty home-work trips are as follows:

1984		155,000
2010	proposed project	184,068
	GMA-1	231,018
	GMA-2	203,158
	GMA-3	182,972
	GMA-4	189,812
9. Refer to the RMP FEIR's responses to the comments contained in the City of Irvine's letter, dated November 15, 1988, for a discussion of these issues.



**SOUTHERN CALIF. ASSOCIATION
OF GOVERNMENTS**

The Metropolitan Water District of Southern California

Office of the General Manager

NOV 14 1988

Mr. Mark Pisano, Executive Director
Southern California Association
of Governments
Suite 1000
600 South Commonwealth Avenue
Los Angeles, California 90005

Dear Mr. Pisano:

Growth Management Plan

We have reviewed your Draft Environmental Impact Report (DEIR) for the project identified above. The comments herein represent our response to your proposed action as a Responsible Agency under the California Environmental Quality Act (CEQA).

To present a more accurate description of the water supply and quality issues affecting the Southern California Association of Governments (SCAG) region, we are suggesting a number of revisions to your DEIR. For your convenience, we have included our detailed comments on the attached pages of the DEIR.

In general, our comments address inaccuracies related to State Water Project and Colorado River supplies, alternatives to provide additional supplies and more efficient use of existing water resources, projected regional shortfalls, and how Metropolitan and other agencies should meet projected demand (mitigation measures).

We appreciate the opportunity to review your DEIR. If we can be of further assistance, please contact me at (213) 250-6437.

Very truly yours,

~~Robert A. Ober~~

Roberta L. Soltz, Ph.D.
Environmental Section Head

RLS / gg

Attachment

CHAPTER 6. PUBLIC SERVICES

WATER SUPPLY AND QUALITY

Setting

Existing Water Sources and Uses

Local Supplies. Local surface water sources and groundwater basins provide about one-third of the region's water supply. The largest surface water sources in the region are the Colorado River and the Santa Ana and Santa Clara River systems. Major groundwater basins in the region include the Central, Raymond, San Fernando, and San Gabriel Basins (Los Angeles County); the Upper Santa Ana Valley Basin system (San Bernardino and Riverside Counties); the Coastal Plain Basin (Orange County); the Coachella Valley Basin (Riverside County); and the Oxnard Plain Basin (Ventura County).

Local water resources are fully developed and are expected to remain relatively stable in the future on a regionwide basis. However, local water supplies may decline in certain localized areas and increase in others. Several groundwater basins in the region are threatened by overdrafting, increasing levels of salinity, and contamination by toxics or other pollutants. Local supplies may also be reduced by conversion of agricultural land to urban development, thereby reducing the land surface available for groundwater recharge. The future use of groundwater could also be limited by water quality, since levels of salinity in sources currently used for irrigation could be unacceptably high for domestic use, requiring demineralization prior to such use.

Imported Supplies. Approximately 64 percent of the SCAG region's water supply is imported from other areas of the state. Several major conveyance systems bring water to the urbanized portion of the region from northern California, via the State Water Project (SWP); the Sierra Nevada, via the Los Angeles Aqueducts; and the Colorado River, via the Colorado River Aqueduct. The All-American/Coachella Canals deliver agricultural irrigation water from the Colorado River to the Coachella and Imperial Valleys.

The continued availability of water ^{slightly over time} from these sources is uncertain at current levels. The firm or dependable yield of the SWP system, based on existing facilities, is expected to decrease ~~by 2000~~ as water use in areas of origin in northern California increases, ^{and} Central Valley Project (CVP) contractual obligations increase, ^{and} ~~users with prior rights to northern California water supplies exercise those rights (Southern California Association of Governments 1987)?~~

dependable supply

92 The amount of water that California imports from the Colorado River
47 (including surplus flows) is expected to decline substantially in the near
future when the Central Arizona Project (CAP) becomes fully operational by
the early 1990s. The Metropolitan Water District of Southern California's
(MWD's) annual apportionment of Colorado River water would be reduced by
approximately 626,000 million acre-feet (MAF) (55 percent) from 1.20 MAF to
0.55 MAF as a result of the CAP and increased water use by upper Colorado
River basin states. Annual apportionments to the Imperial Irrigation
District, Coachella Valley Water District, and Palos Verdes Irrigation
District, which currently total 300,000 AF, would be eliminated by operation
of the CAP. (California Department of Water Resources 1987)

[Insert,
next
page]

State Water Project. If additional water supplies are not secured, SWP contractors in the region will face increasing risks of water supply deficiencies during dry years. Of the 1.86 MAF in maximum SWP entitlements held by contractors in the MWD service area for 1988, a total of 1.08 MAF in approved orders were processed (58 percent of maximum entitlements) due to facilities constraints. Maximum entitlements to these contractors are scheduled to increase to 2.0115 MAF per year in 1990 (Horne pers. comm.).

Efforts to increase dependable yields through the SWP have included a Coordinated Operation Agreement between the State and the U. S. Bureau of Reclamation, completion of additional pumping capacity in the Delta, development of additional offstream storage facilities, and water transfers from agricultural to urban SWP contractors. Statewide estimates indicate that annual net use of SWP supplies will increase by 800,000 AF (33 percent) from 1985 to 2010, increasing from 2.4 MAF to 3.2 MAF. The SWP would not be able to meet this increased demand in most years with existing facilities, but could do so in approximately 4 of every 5 years, assuming that existing facilities are expanded as planned (California Department of Water Resources 1987).

Los Angeles Aqueducts. The Los Angeles Aqueducts currently provide nearly 470,000 AF per year or 80 percent of the water supply for the City of Los Angeles. However, pending or future litigation and legislation aimed at reducing both the diversion of water from the Mono Basin and groundwater pumping in the Owens Valley could lessen this yield substantially.

Colorado River. Because of an increase in the use of entitlements by users in Arizona, the dependable supply of Colorado River water allocated to the MWD has been reduced from 1.202 MAF to 0.55 MAF per year, and is conservatively projected at 0.47 MAF per year by MWD staff (Chan pers. comm.). The Imperial Irrigation District, Palos Verdes Irrigation District, and Coachella Valley Water District hold priority to the first 3.85 MAF of California's 4.4 MAF apportionment of Colorado River water. Strategies for transferring the use of these supplies from agricultural to urban uses are currently being investigated by the MWD.

after deductions for rights held by others and system losses.

Based on historic diversion of Colorado River to Coachella Valley Water District. Loss in dependable supplies could be as much as 238,000 of 3.6 MAF in 2010

more efficient

If additional water supplies are not secured, SWP contractors in the region will face increasing risks of water supply deficiencies during dry years. The total maximum SWP entitlements held by contractors south of the Tehachapis for 1988 was 2.213 MAF of which 1.86 was for MWD. In 1988, all contractors south of the Tehachapis requested 1.188 MAF; MWD's request was 1.03 MAF. All requests were approved. Until the East Branch of the California Aqueduct is enlarged in 1992, MWD can only import about 1.4 MAF from the SWP; however, MWD's maximum annual entitlement will increase to 2.0115 MAF in 1990.

Subregional Assessments

Water demand and supply projections shown in Table 6-1 consider two major subregions. The largely urbanized coastal plain subregion includes all of Orange County, most of Los Angeles County, large portions of Ventura County and Riverside County, and a smaller portion of San Bernardino County. The outlying subregion includes all of Imperial County, northern Ventura County, northern Los Angeles County, eastern Riverside County, and the remainder of San Bernardino County. Subregions are shown in Figure 6-1.

9 Coastal Plain Subregion. The 1984 population of the coastal plain subregion was approximately 11.08 million (89 percent of the regional total). Approximately 2.84 MAF (2,536 MGD) of water was utilized in this subregion in 1984 by urban and agricultural uses, which represented 89 and 11 percent of regional water demand, respectively. About one-third of the water used in that year was derived from groundwater ^{and surface} supplies and local sources; the remainder was imported from the Colorado River ^{(thru the} the Sacramento Delta (through the SWP) and the Owens/Mono basins (through the Los Angeles Aqueducts).

Northern California If untreated, water degraded by increased levels of salts, nitrates, and other pollutants could render certain groundwater in basins in this subregion unsuitable for domestic consumption. *the Colorado River Aqueduct*

Outlying Subregion. The 1984 population of the outlying subregion was approximately 1.37 million (11 percent of the regional total). Most areas of the outlying subregion are heavily dependent on local surface and groundwater resources as major sources of supply for both domestic and agricultural uses. Supplemental supplies are also currently available in some areas through SWP contractors. The largest source of supply in this subregion is the Colorado River. The Imperial Irrigation District, Coachella Valley Water District, and Palos Verdes Irrigation District hold priority to 3.85 MAF annually of Colorado River Water.

Past population growth and agricultural development have resulted in groundwater pumping that has greatly exceeded safe yield levels. Many major groundwater supply sources in this subregion are overdrafted, including the Oxnard Plain Basin (Ventura County), Antelope Valley Basin (north Los Angeles County), Mojave Basin (San Bernardino County), and the Coachella Valley Basin (Riverside County). As in the coastal plain subregion, water degraded by increased levels of salts, nitrates, and other pollutants could render certain groundwater in basins in this subregion unsuitable for domestic consumption if untreated.

Water Service Providers

Metropolitan Water District. The primary supplier of water to the region is the MWD. The MWD covers 5,130 square miles of the coastal plain in southern California, including 240 cities and unincorporated communities in Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura Counties. The MWD service area excludes certain portions of the SCAG region, i.e. Imperial County and most of San Bernardino County, and is

Table 6-1. Regional and Subregional Water Supply and Demand Projections in 1984 and Under the Proposed Project and Alternatives (2010)

	REGIONAL TOTAL (1984)	REGIONAL TOTAL (2010)	PLAIN SUBREGION (2010)	OUTLYING SUBREGION (2010)
Dependable Supplies (MAF per year)	7.48	6.72	2.60	4.12
Demand (MAF per year)				
Urban	3.03	3.98	3.62 (3.07)	0.91
Agriculture	4.02	3.94	0.74 (0.23)	3.71
Total	7.06	7.92	3.30	4.62
Projected Surplus (Shortfall) (MAF per year)	0.42	(1.20)	(0.70)	(0.50)
Projected Surplus (Shortfall) as Percentage of Total Demand	5.95	(15.15)	(21.2)	(10.8)

Source: Southern California Association of Governments (1987)

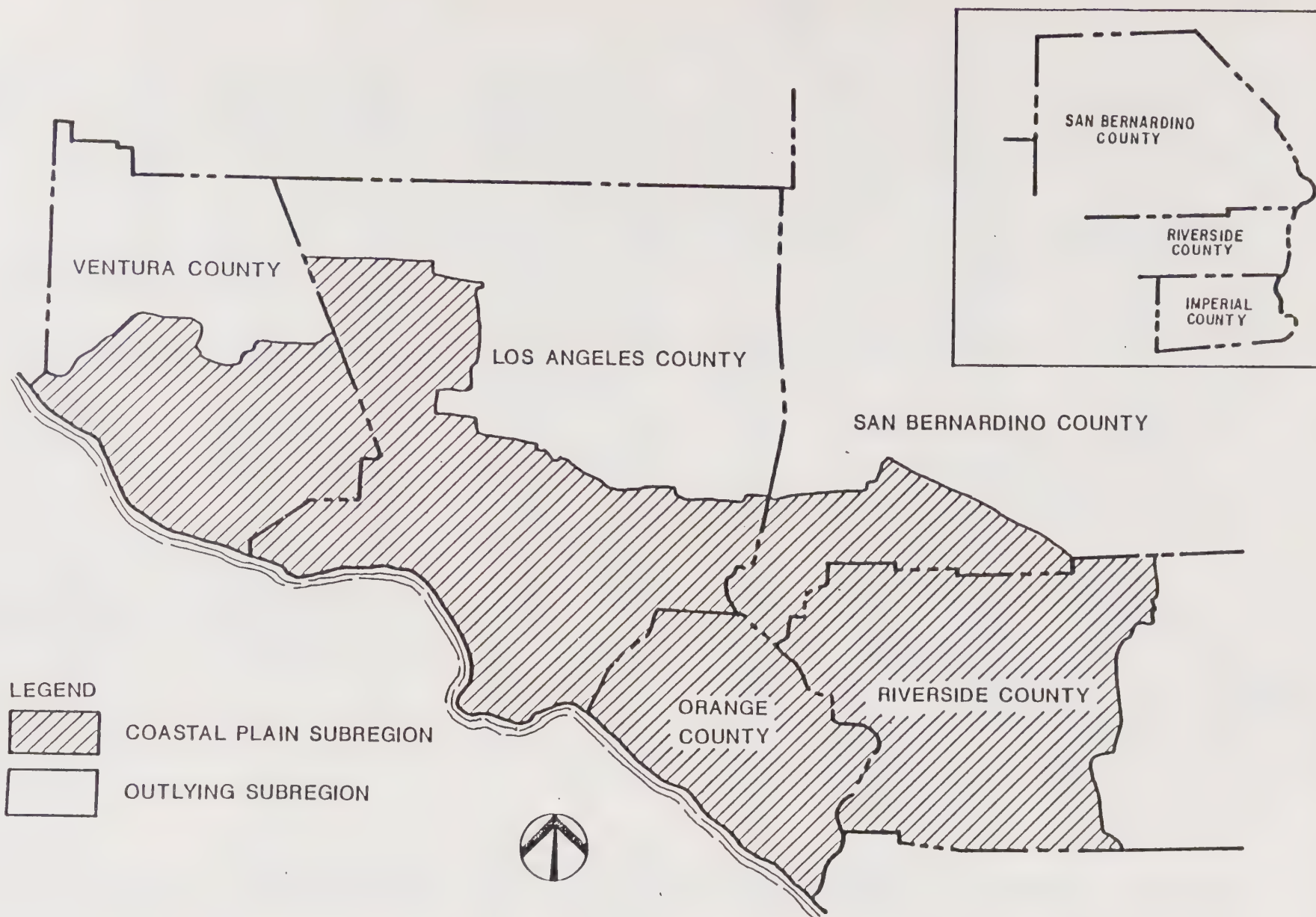


FIGURE 6-1. COASTAL PLAIN AND OUTLYING SUBREGIONS

generally contiguous with the coastal plain subregion as shown in Figure 6-1.

The population of the MWD service area has increased from 7.4 million in 1960 to more than 14 million in 1986, which represents approximately half of the state's population (State Water Contractors 1987a, Southern California Association of Governments 1987). The MWD sells water to 27 local districts, including the Los Angeles Department of Water and Power, 13 other cities, 12 municipal water districts, and one county water authority.

The MWD ^{is dependable or firm supply is estimated to be} holds rights to approximately 3.37 MAF per year of dependable or firm supply, including 1.19 MAF from local sources, 1.14 MAF from the SWP, 0.47 MAF from the Colorado River, 0.42 MAF from the Los Angeles Aqueducts, and 0.15 from wastewater reuse (Chan pers. comm.). Firm or dependable yield is the annual supply expected to be available during periods of below-average precipitation, in accordance with a predetermined schedule or probability. Dependable supplies were estimated to exceed total average demand by 0.42 MAF (6 percent) in 1984, as indicated in Table 6-1.

Los Angeles Department of Water and Power. The City of Los Angeles Department of Water and Power (LADWP) is the second largest importer of water to the urbanized portion of the SCAG region. Although it is within the MWD service area and a member of the MWD, nearly 82 percent of the city's water demand in 1980-81 was met by the LADWP by importing supplies through the Los Angeles Aqueducts from the Owens Valley and Mono Basin, 12 percent was derived from local groundwater sources, and only 6 percent was provided by the MWD (Southern California Association of Governments 1982). The amount of water imported to the City of Los Angeles by the LADWP could be substantially reduced, pending the outcome of present and future litigation as discussed above.

Other Providers. Other major water providers include the Imperial Irrigation District, the Coachella Valley Water District, and the Palos Verdes Irrigation District.

Water Resource Alternatives. The MWD and other water providers are currently exploring various strategies for increasing water supplies and maximizing use of existing supplies. Imported supply options include storage of water from existing sources, use or storage of surplus water from other states or agricultural agencies, and predelivery of exchange water to irrigation districts. ^{during wet periods} ^{using Colorado River water} ^{water agencies in Coachella Valley}

The MWD ^{is considering storage} has proposed storage of up to 3.0 MAF of surplus water in the Chino Basin (San Bernardino County), San Jacinto Basin (Riverside County), Main San Gabriel Basin (Los Angeles County), Raymond Basin (Los Angeles County), North Las Posas Basin (Ventura County), Coachella Valley Basin (Riverside County), and Arvin-Edison Basin (Kern County). The feasibility of this strategy, however, may be limited by the adverse effects of groundwater quality due to leaching of contaminants from the soil and disturbance of aquifers (Sienkiewich pers. comm.).

*Note:
this value is for the entire region.
This value is misplaced

unused entitlements of Colorado River Water from other lower Colorado River Basin states and

Reclaimed wastewater is the largest undeveloped local water resource available to offset future deficits in supply. Reclamation projects have been implemented in various areas within the region. The feasibility of increasing wastewater reclamation is limited by insufficient distribution capacity, cost, health concerns, and liability issues. The MWD provides financial support to local districts for wastewater reuse and groundwater treatment projects and is investigating methods of reducing and mitigating groundwater contamination (Sienkiewich pers. comm.).

Water Quality

The following analysis considers the quality of surface and groundwater sources that lie within the Santa Clara River Basin, Los Angeles River Basin, Santa Ana River Basin, and coastal and desert areas.

Santa Clara River Basin. The Santa Clara River Basin area is located in Ventura County and northern Los Angeles County and is drained by the Santa Clara River, which empties into the Pacific Ocean near Oxnard.

Surface water sources. Water from major reservoirs in the basin area is provided largely by the SWP and Los Angeles Aqueducts, and is generally of high quality. Tributary creeks generally possess good water quality except during low flows. Quality of the Santa Clara River is poorer and worsens in downstream sections when groundwaters rise, bringing high levels of total dissolved solids (TDS), irrigation return flows, and other contaminants.

Groundwater sources. Nine important groundwater basins are located in this area, with the Oxnard Plain Basin being the most important. Groundwater quality in the Oxnard Plain Basin has been deteriorating because of deep percolation of sewage, irrigation return flows, industrial wastes, and saltwater intrusion. Groundwater quality is generally good in the upper Santa Clara River Basin (Los Angeles County) but worsens near the Los Angeles County-Ventura County line. High TDS concentrations are common in the Santa Clara River Valley area.

Los Angeles River Basin

The Los Angeles River Basin area is located in southern Los Angeles County and is drained by the Los Angeles River, San Gabriel River, and Malibu Creek.

Surface water sources. The Los Angeles River system has minor water quality problems that are attributable to high pH, nitrate/nitrite, chlorine levels, and low dissolved oxygen. The Los Angeles River drainage includes large recreation and wildlife habitat areas in the San Fernando Valley. Minor water quality problems caused by urban runoff and point source discharges have occurred in urbanized portions of the San Gabriel River drainage system, but good water quality exists in the source areas of the San Gabriel Mountains. Malibu Creek and its tributaries are an intermittent stream system that drains a portion of the western Santa Monica Mountains. This drainage area has high TDS levels, and water quality has been reduced by wastewater discharge into the creek.

Groundwater sources. This area includes the Los Angeles Coastal Plain, San Fernando Valley, and San Gabriel Valley Basins. Water quality in the Los Angeles Coastal Plain Basin is generally good, although saltwater intrusion has been a problem along the coast. Quality is generally good in the San Fernando Valley Basin but the quality of water extracted by the City of Los Angeles has deteriorated due to overdrafting and intrusion of poorer quality groundwater. Localized problems brought about by high nitrate, toxics, and TDS levels have occurred in the San Gabriel Valley Basin, and a major Superfund groundwater decontamination project is in progress in this area.

Santa Ana River Basin

The Santa Ana River Basin area is located in Orange County and the western (nondesert) portions of San Bernardino and Riverside Counties.

Surface water sources. ~~Improper~~^g operation of individual sewage storage or treatment systems in the upper Santa Ana River area has degraded stream water quality. High TDS and nutrient levels have reached lower portions of the river due to rising groundwater of low quality, urban runoff, and nonpoint agricultural pollution. Lakes in this area receive water from the SWP and Colorado River and have fair to good water quality.

Groundwater sources. Primary groundwater basins in this area include Orange County Coastal Plain, Upper Santa Ana River Valley, San Jacinto, Elsinore, and San Juan Creek. Groundwater quality is generally good in this area. Deterioration has occurred, however, due to recharge by Colorado River water, percolation of irrigation wastewater, overdrafting, seawater intrusion, and mineralization, and water quality was compromised further by municipal, industrial, and agricultural waste disposal. Groundwater problems have been alleviated by an increased use of Colorado River water by southern Orange County.

Marine Water

The coastal waters of the SCAG region consist of the southern portion of Santa Barbara Channel, Santa Monica Bay, and the San Pedro Channel, including San Pedro Bay.

The circulation of nearshore marine waters determines the extent to which pollutants are diluted and distributed. Nearshore water circulation patterns are determined by the major currents formed by the southeastward-flowing California current and its eddies, the onshore-offshore tidal currents (which are especially important in enclosed bays and estuaries), and the effects of wind and local topography.

Pollutants are introduced into the marine environment by point and nonpoint discharges. Point source discharges include effluents from municipal sewage treatment facilities, industrial wastewater discharges, and cooling water discharges (primarily from utility power plants). The most important source of nonpoint discharges is runoff from land, particularly urban storm runoff. Pollutants of greatest concern are heavy metals (e.g., zinc, copper, lead, cadmium, and mercury), nutrients such as nitrates and phosphates, and trace organic compounds such as halogenated hydrocarbons.

In general, offshore water subject to the diluting effects of major current systems has not been substantially degraded. In localized areas, however, with the weak current systems of some bays and estuaries, substantial degradation has occurred, and concerns are mounting over the adverse effects on ecosystems and public beaches in these areas.

Desert

The desert subregion includes most of San Bernardino County, eastern Riverside County, and Imperial County.

Surface water sources. Few water quality problems exist in this area with the exception of the Salton Sea vicinity, which has high and increasing salinity as a result of irrigation return flows, increasing salinity of Colorado River water, and inadequately treated municipal discharges (particularly from sources in Mexico).

Groundwater sources. Groundwater quality problems in the South Lahontan Basin, located in desert portions of Los Angeles and San Bernardino Counties, include overdrafting and pollution from mining and sewage wastes. West Colorado River Basin water is mostly unusable, and the use of East Colorado River Basin water is limited as a result of increasingly high salinity near the Colorado River. Local groundwater supplies along the Colorado River are also poor where they are affected by saline river water, failing septic tanks and leachfield systems, and irrigation return flows.

Impacts and Mitigation Measures

Since the 2010 regional population is assumed to be the same under the proposed project and alternatives, and water demand is assumed to be proportional to population, effects of the various growth projections on water supply would be comparable at a regional level.

Proposed Project

Impact: Regional Water Supply Shortfall of 1.2 in 2010

Water supply and demand projections are shown in Table 6-1. Water demand in 2010 will be influenced by such factors as population growth, levels of agricultural production, land use patterns, water costs, and water conservation measures. It is assumed that urban per capita water consumption rates would decline by approximately 5 percent by 2010 as a result of water conservation measures and increased housing densities (Southern California Association of Governments 1987).

Water demand projections for urban and agricultural uses are based on "normal" weather conditions, although per capita use may vary significantly from year to year depending on rainfall and temperature levels. Estimates of dependable supply levels are based on "dry" periods, with higher levels expected in "normal" or "wet" years and lower levels expected in extremely "dry" or drought years. Such projections assume that both local and Los Angeles Aqueduct supplies remain stable but do not include additional yields

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that may become available to the region (e.g., through cooperative water management programs with irrigation districts, the State, or the U. S. Bureau of Reclamation) because of their uncertainty. The potential effects that changes in water pricing would have on supply and demand are not considered in this analysis.

Substantial increases in urban water demand from population growth expected under the proposed project and smaller declines in agricultural water demand would increase regional water use by approximately 0.86 MAF (12.2 percent) between 1984 and 2010. Urban demand would increase by 0.95 MAF (31.7 percent) and agricultural demand would decrease by 0.08 MAF (2.0 percent). By 2010, agriculture and urban uses within the region would demand approximately the same amount of water. Approximately 58 percent of regional water demand in 2010 would come from the outlying subregion, based largely on agricultural water use (Southern California Association of Governments 1987).

DWR water demand projections for the MWD service area (including San Diego County and excluding Imperial County) indicate similar patterns among agricultural and urban land uses. Agricultural water use in this area is expected to decline by 0.24 MAF (17 percent), from 1.4 MAF in 1985 to 1.16 MAF in 2010, as irrigated acreage and water use per acre continue to fall. However, DWR has also projected that agricultural water demand in the San Diego Hydrologic Study Area will increase during the same period by 1.5 percent as the result of 4.6 percent growth in irrigated agricultural acreage within that area (State Water Contractors 1987a).

NOT TRUE
according
to our
sources

Urban water demand in the MWD service area is projected by ^{MWD}DWR to increase 0.94 MAF (30.3 percent), from 3.10 MAF (1985) to 4.04 MAF (2010). Approximately half of this increase would be generated in Ventura, Los Angeles, and Orange Counties, with the balance generated in Riverside, San Bernardino, and San Diego Counties. The rate of increase would be highest in Riverside County (95 percent) and San Bernardino County (81 percent), and lowest in Los Angeles County (15 percent) and San Diego County (37 percent). Water demand by commercial and institutional uses is expected to grow at the greatest rate (49 percent) from 1985 to 2010, with residential demand increasing by 32 percent, industrial demand increasing by 20 percent, and demand from public and unaccounted uses increasing by 13 percent (State Water Contractors 1987a).

During this period, dependable supplies ^{for the SCAG region} are expected to decline by 0.76 MAF (10.2 percent). These trends would result in a projected shortfall of 1.20 MAF in 2010, with supplies meeting less than 85 percent of total demand in that year. Lesser shortfalls would be expected in wet years and greater shortfalls would be expected in dry years.

The effects of increased water demand resulting from the proposed project would vary geographically within the region. The projected shortfall would be more severe in the coastal plain subregion, where dependable supplies total 2.60 MAF (78.8 percent of projected demand). Supplies would be expected to meet 89.2 percent of the demand in the outlying areas.

Cumulative projections by the MWD indicate an even more severe shortfall. The MWD forecasts a deficit of approximately 1.0 MAF in 2010

based on a 3.37 MAF supply that would meet 77.5 percent of estimated total demand (4.35 MAF) within the MWD service area (Chan pers. comm.).

including San Diego County

Although total water demand levels would increase less rapidly than population growth under the proposed project, the increase is considered a significant impact as a result of projected shortfalls and the many constraints affecting both local and imported supplies.

This impact is considered significant but could be reduced to less than significant through implementation of the following measures, which are based on regional and statewide plans and projects (California Department of Water Resources 1987, Boronkay 1988).

Mitigation Measures

- o The MWD and other water providers in the region should increase dependable annual supplies at a regional level by 2010 to at least 8.0 MAF and make the fullest use of existing resources by implementing the following measures as needed:
 - increase SWP yields through implementation of a Coordinated Operation Agreement between the State and the U. S. Bureau of Reclamation; completion of various Delta facility capacity improvements (including completion of Delta Pumping Plant, South Delta improvements, North Delta improvements, ~~North Delta water management and Delta levee improvements~~, *North We* offshore storage programs (including Kern Water Bank, Los Banos Grandes Reservoir, ~~Kellogg/Los Vaqueros Reservoirs~~, and Delta island reservoir storage), CVP programs (including interim water supply acquisition and New Melones Reservoir conjunctive-use program), and other SWP programs (including Cachuma Reservoir enlargement); and implementation of water transfer agreements ~~between agricultural and urban SWP contractors.~~
 - obtain maximum use of Colorado River supplies through implementation of various programs, including use of available surplus water from agricultural agencies and other states, Imperial County groundwater storage and recovery, Imperial County water conservation and surplus water diversion, Coachella Branch and All-American Canal lining projects, Palos Verdes Irrigation District water utilization, and Colorado River water banking;
participate in programs to store
~~- store up to 3.0 MAF of surplus water in groundwater basins~~
(e.g., Main San Gabriel Basin, Chino Basin, Coachella Basin, and San Jacinto Basin) as indicated above, provided that potential adverse effects on groundwater quality can be avoided or adequately mitigated; and
 - make optimum use of existing resources and minimize adverse effects of supply shortfalls by expanding and implementing other programs, including local wastewater reclamation, groundwater protection, groundwater treatment, water conservation,

surface water storage, and drought contingency planning projects.

Impact: Degradation of Surface Water, Groundwater, and Marine Water Quality

Certain surface water, groundwater, and marine water resources would be degraded by pollutants resulting from growth projected under the proposed project. The local extent and location of this degradation cannot be accurately determined without more specific information concerning the location of future development and pollutant discharges by source.

In general, population growth and associated development would increase quantities of point discharges by both industrial and municipal sources. These discharges would increase levels of dissolved and suspended solids, thermal effluents, nutrients, salts, toxic metals, and organic substances, depending on the effects of pollution control measures. The quality of wastewater discharges could also be adversely affected if shortfalls in wastewater treatment capacity occur as projected below. (see "Wastewater Treatment" section below). Pollutants could result in increased turbidity and sedimentation, plankton blooms, reduced dissolved oxygen levels, and toxic effects to biota. Effects on marine waters from increased wastewater discharge levels would be most critical.

Projected growth would result in increased nonpoint surface water pollution due to increased runoff from urban and industrial lands and construction sites. Fallout of air pollutants could result in added acid and toxic metal pollution of surface waters.

Groundwater quality could be degraded by the infiltration of polluted surface waters, urban irrigation waters, leachates from failed septic and leachfield systems, and flows from solid and hazardous waste disposal sites. Development could also result in seawater intrusion and reduced groundwater quality from overdraft.

Adverse effects on marine water quality would result primarily from direct discharges of wastewaters to the marine environment and from the runoff of polluted water from the land surface. Additional effects could result from ocean vessel operations and aerial fallout, which is a major source of lead pollution. Effects of pollutants on bays and estuaries because of reduced water circulation, habitat requirements, and the recreational value of these areas. Increased use of secondary sewage treatment and mandatory reduction or elimination of sludge discharges could partially offset the effects of increased wastewater volumes but would have less effect on nonbiodegradable pollutants such as toxic metals and chlorinated hydrocarbons.

Adverse effects on surface water, groundwater, and marine water resources from population growth and urbanization represent a significant impact under the proposed project. This impact could be reduced to less than significant with implementation of the following measures.

Mitigation Measures

- o Local jurisdictions should link development phasing with phasing of new infrastructure, including adequate and effective drainage, wastewater, and waste disposal facilities.
- o Under direction of the U. S. Environmental Protection Agency, the State Water Resources Control Board, Regional Water Quality Control Boards, and local and regional agencies should administer National Pollutant Discharge Elimination System permits for point dischargers and implement comprehensive basin plans for groundwater protection and treatment.
- o Applicable jurisdictions and agencies should continue their influence and expand local coastal zone planning and management programs in conjunction with the State to prevent or reduce adverse effects on coastal water quality and to preserve or improve areas of special importance such as bays and estuaries.
- o Local jurisdictions should implement regional air quality mitigation measures to reduce or eliminate the potential adverse water quality effects of lead fallout and acid precipitation.
- o Local jurisdictions and water providers should mitigate groundwater quality problems (overdrafting, seawater intrusion, recharge effects) by improving groundwater basin management as recommended in Regional Water Quality Control Board groundwater basin plans using various methods, including: conjunctive use of surface water, groundwater, and reusable wastewater; appropriate use of artificial recharge; and controls on development in recharge areas.
- o Local jurisdictions should mitigate adverse effects of water pollution from nonpoint and other sources by implementing measures in SCAG's Areawide Waste Treatment Management Plan, including: implementing plans for containing and cleaning hazardous substance spills; strengthening and enforcing local management controls on construction site erosion and sediment control; implementing best management practices to control water pollution from agricultural areas; implementing improved streets, litter, catchbasin, inlet basins, and storm drain cleaning programs; and implementing measures to limit runoff and minimize peak flows from developing areas.

GMA-1

Impact: Regional Water Supply Shortfall of 1.2 MAF in 2010 and Degradation of Surface, Groundwater, and Marine Water Quality

Regional water supply shortfalls and water quality impacts that would result from growth under GMA-1 would be generally comparable to those described for the proposed project. These impacts are considered significant.

Within the coastal plain subregion, water supply and quality impacts under GMA-1 would be less extensive in certain areas of Ventura County and Los Angeles County (as well as marine waters in the vicinity of these areas) than those which would occur under the proposed project as a result of lower levels of projected population and employment growth. Other areas within the coastal plain subregion (e.g., Orange County) would experience more extensive impacts under GMA-1 as a result of higher levels of projected growth.

Expected water supply and quality impacts of GMA-1 in the outlying subregion would differ from those that would occur under the proposed project as a result of higher population growth levels and lower employment growth levels for Riverside, San Bernardino, and Imperial Counties. However, the nature and extent of these differences cannot be accurately determined based on available information.

These impacts could be reduced to less than significant with implementation of the following measures.

Mitigation Measures

- o Same as those identified for the proposed project.

GMA-2

Regional water supply shortfalls and water quality effects that would result from growth under GMA-2 would be generally comparable to effects of the proposed project as discussed above. However, effects within certain areas of the coastal plain subregion (e.g., Orange County) would be more extensive than those which would occur under the proposed project as a result of higher levels of projected population and employment growth.

GMA-3

Regional water supply shortfalls and water quality effects that would result from growth under GMA-3 would be generally comparable to effects of the proposed project as discussed above. Effects within the coastal plain subregion (particularly Orange County) would be less extensive than those which would occur under the proposed project as a result of lower overall levels of projected population and employment growth. Effects within certain areas of the outlying subregion would be somewhat more extensive as a result of higher levels of projected population growth.

GMA-4

Regional water supply shortfalls and water quality effects that would result from growth under GMA-4 would be generally comparable to effects of the proposed project as discussed above. Effects within certain areas of the outlying subregion (e.g., Imperial County) would be somewhat more extensive as a result of higher levels of projected population and employment growth.

GMA-Low

The demand for public services would generally be less under GMA-Low than under the proposed project or GMA-1 because of the smaller population to be served. The level of demand for services that would occur under GMA-Low has not been quantified, and the relative effect of GMA-Low on public services would be comparable to those discussed for the proposed project and GMA-1.

GMA-High

The demand for public services would generally be greater under GMA-High than under the proposed project or GMA-1 because of the larger population to be served. The level of demand for services that would occur under GMA-High has not been quantified, and the relative effect of GMA-High on public services would be comparable to that discussed for the proposed project and GMA-1.

WASTEWATER TREATMENT

Setting

Nearly 90 percent of the regional population is served by 109 public- or municipally owned wastewater treatment plants, with the remaining 10 percent relying on privately operated septic tanks or small package treatment plants. Approximately 75 jurisdictions within the region provide wastewater collection, treatment, and disposal services (Southern California Association of Governments 1987).

The wastewater volume handled by all treatment plants in the region in 1985, 1,660.5 million gallons per day (MGD), represented 87 percent of the estimated collective capacity of those plants. Since peak flows exceed average daily wastewater flows (ADWF) by as much as 25 percent, plants operating at 75 percent capacity often are considered in need of expansion (Southern California Association of Governments 1987). In 1985, ADWF comprised 73 percent of countywide wastewater capacity in Riverside and San Bernardino Counties, 79 percent in Ventura and Imperial Counties, and 90 percent in Los Angeles and Orange Counties (Southern California Association of Governments 1987).

Some districts have ample treatment capacity, while other districts are approaching or exceeding their capacities, resulting in violations of state and federal waste discharge regulations. Table 6-2 identifies districts handling ADWFs in excess of 75 percent capacity. Some of these districts have plans to expand their wastewater treatment facilities, while districts not listed could also experience future shortfalls if they undergo very high levels of growth.

Table 6-2. Wastewater Districts with Average Flows Exceeding
75 Percent of Capacity, 1985

	Percent of Existing Capacity Used by Average Flows
<u>VENTURA COUNTY</u>	
Ojai Valley Sanitary District	87
City of Oxnard*	86
Saticoy Sanitary District	278
Simi Valley County Sanitation District*	92
City of Thousand Oaks (Hill Canyon Plant)*	90
Triunfo County Sanitation District*	89
Ventura County Waterworks District No. 1 (Moorpark)	93
<u>LOS ANGELES COUNTY</u>	
City of Avalon	134 (summer)
City of Los Angeles	
Hyperion	94
Los Angeles/Glendale Plant	100
County Sanitation Districts	
Joint Water Pollution Control Plant	94
San Jose Creek WRP	82
Whittier Narrows WRP	80
Pomona WRP	100
Los Coyotes WRP	93
Lancaster WRP*	124
Los Angeles County Public Works Department	
Lechuza Point Plant	83
Trancas Plant	83
Malibu Mesa Plant	100
<u>ORANGE COUNTY</u>	
Capistrano Beach Sanitary District*	86
County Sanitation Districts of Orange County*	98
Dana Point Sanitary District*	80
El Toro Water District	92
City of San Clemente*	85
City of San Juan Capistrano*	88
<u>RIVERSIDE COUNTY</u>	
City of Banning*	100+
City of Beaumont*	87
City of Blythe	85
City of Coachella*	83-100
City of Riverside	86
Coachella Valley Water District (Bombay Beach)	89
Eastern Municipal Water District	
Hemet-San Jacinto Plant	84
Sunnymead Plant	76
Edgemont Community Service District	100
Mecca Sanitary District	87
<u>SAN BERNARDINO COUNTY</u>	
Big Bear Area Regional Wastewater Agency*	78
Chino Basin Municipal Water District*	
Regional Plant No. 2 (Chino)*	94
Regional Plant No. 3 (Fontana)	100+
Helendale County Service Area	88
San Bernardino Valley Municipal Water District	
City of Redlands	78
City of San Bernardino	80-95
Victor Valley Wastewater Reclamation Authority	77

RESPONSES TO THE COMMENTS OF THE METROPOLITAN WATER
DISTRICT OF SOUTHERN CALIFORNIA

10. The "Water Supply and Quality" section of Chapter 6 has been amended in response to Metropolitan Water District staff's corrections and additions, as indicated in the errata to pages 6-1, 6-2, 6-3, 6-4, 6-6, 6-8, 6-9, 6-10, and 6-11 of the DEIR.

RESOURCE MANAGEMENT AGENCY
county of ventura

Planning Division

Keith A. Turner
Manager

November 16, 1988

Paul Hatanaka
SCAG
600 S. Commonwealth Ave, Suite 1000
Los Angeles, CA. 90005

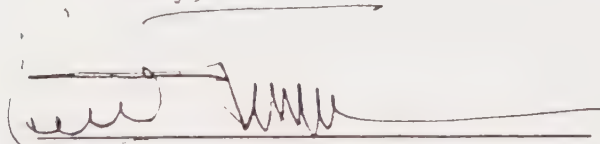
SUBJECT: Growth Management Plan

Dear Mr. Hatanaka

Thank you for the opportunity to review the subject document. This report was circulated to interested County agencies for review. The response is attached.

If you have any questions, please call Kim Hocking at (805) 654-2414 and he will direct you to the appropriate staff member.

Sincerely,



Keith Turner
Manager

Reference No. 88-133

KT:sm

cc: APCD - Mount
Attachments:

NOV 17 1988

SOUTHERN CALIFORNIA ASSN.
OF GOVERNMENTS

COUNTY OF VENTURA
RESOURCE MANAGEMENT AGENCY

MEMORANDUM

TO: Kim Hocking, Planning DATE: November 11, 1988
FROM: Bill Mount, APCD *BM* 88-133
SUBJECT: SCAG Growth Management Plan EIR

Chapter 8, Air Quality, of the subject EIR focuses on the South Coast Air Basin (SCAB). While Ventura County Air Pollution Control District (APCD) staff recognizes that this air basin is of greatest concern to the Southern California Association of Governments (SCAG), APCD staff recommends that Chapter 8 include a discussion of Ventura County's air quality problem and the findings of the recently adopted 1987 Ventura County Air Quality Management Plan (AQMP). There are two reasons for this recommendation. First, Ventura County is part of the SCAG planning area. Second, Ventura County has one of the most severe air quality problems in the country, frequently exceeding the national ambient air quality standard for ozone.

The 1982 Ventura County Air Quality Management Plan, the predecessor to the 1987 AQMP, predicted that Ventura County would not attain the federal ozone standard any time this century. However, the analyses done for the 1987 AQMP did not provide the information needed to predict a specific attainment date. While the 1987 AQMP does not specify an attainment date, the emission forecasts used in the 1987 AQMP decrease until about 1995 then increase thereafter. The emission increases are due almost entirely to population growth overshadowing emission reductions associated with the control tactics contained in the 1987 AQMP.

The Environmental Protection Agency recently disapproved the 1982 AQMP for failure to demonstrate attainment of the federal ozone standard by December 31, 1987. The disapproval was the result of a citizen lawsuit brought against EPA pursuant to Section 304 of the Clean Air Act. Consequently, EPA is expected to develop and implement a federal implementation plan (FIP) for Ventura County which will demonstrate attainment of the federal ozone standard by a specified date.

The 1982 and the 1987 Ventura County Air Quality Management Plans, and associated documents, are available from the APCD. If you wish to obtain any of these documents or have any questions, please contact Chuck Thomas of my staff at 805/654-2799.

RESPONSES TO THE COMMENTS OF THE COUNTY OF VENTURA
RESOURCE MANAGEMENT AGENCY

11. Information from this letter regarding attainment of air quality standards in Ventura County is hereby incorporated into the EIR.

The following additional information is also incorporated into the EIR:

Ventura County frequently exceeds the federal ambient air standard for ozone. Simi Valley exceeded the federal ozone standard on 50 days in 1986 and 22 days in 1987. Other areas of the county, especially inland areas, such as the Ojai Valley, Piru, and Thousand Oaks, also frequently exceed the federal ozone standard.

On July 1, 1987, EPA replaced the federal total suspended particulate standard with a standard for inhalable particulates (PM-10). Air quality monitoring data indicates that Ventura County is in attainment of the PM-10 standard.

Ventura County's air quality is affected by transport of pollutants from outside the county. Sources of this pollution have been identified as Los Angeles County, Santa Barbara County, and Outer Continental Shelf oil production, exploration, and shipping activity.

The Ventura County AQMP was updated in July of 1988. It contains new and revised stationary, area, mobile, and transportation control measures. It also contains population projections based on the most recently adopted official countywide population forecasts. Moreover, the plan forecasts emissions through the year 2010. The emission forecasts were based on the most recent socioeconomic forecasts and proposed emission control tactics.



CITY OF ANAHEIM, CALIFORNIA

Office of City Manager

TRANSPORTATION
PLAN

November 17, 1988

SOUTHERN CALIFORNIA ASSOCIATION
OF GOVERNMENTS

Ms. Kathy Jones Irish
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
600 So. Commonwealth Avenue, Suite 1000
Los Angeles, CA 90005

Re: Formal Comments - Draft Growth
Management Plan and EIR, and
Regional Mobility Plan

Dear Ms. Irish:

Thank you for the opportunity to review the above mentioned regional plans. It is recognized that cities should cooperate in the regional setting to address regional issues. To this end, we are pleased to submit the following comments based on the information provided in the Draft Growth Management Plan, the DGMP EIR, and the Regional Mobility Plan for consideration.

GROWTH MANAGEMENT PLAN AND ACCOMPANYING EIR

Review of the two documents are out of sequential order as with other Plans (Air Quality Management Plan, Housing Needs Assessment Plan, etc.) which are to be predicated from this Plan. These Plans have already been adopted and/or reviewed, or were under current review prior to distribution of this document. The Draft Plan and accompanying EIR were not received by the City until the week of October 24, 1988. With the allotted time frame for comment, it is not feasible for the City and its affected departments to review, understand and prepare informed comments on the Draft Plan and EIR, as well as their relationship to previously distributed Plan documents. Specific information relative to Anaheim is not stated and further complicates the review of the document, leading to ambiguity.

Notwithstanding the above, many comments/questions are raised upon review of these two referenced documents. General and specific comments are noted below.

GENERAL COMMENTS:

1. It is difficult to specifically address impacts to Anaheim as the Plan organizes its data on a regional, county, and subregional basis (subregional splitting Orange County, and subsequently Anaheim, into west/east sections). Data specifically for Anaheim is not identified. 14
2. The projections identify growth through the year 2010 for the region. It is important to note that while the thrust of the Draft Plan describes the Baseline Projection with a small discussion on the alternatives, the EIR describes the preferred project alternative as GMA-4 Modified Job/Housing Balance Alternative.

In summary, baseline projections for Orange County indicate that:

"Between 1960 and 1984 the county's population tripled and reached a 1984 population of 2.1 million. By 2010, the Baseline projects 3.1 million people in Orange County...an addition of 1.0 million--double the pace of Los Angeles County, however, significantly slower than both Riverside and San Bernardino Counties.

Orange County is projected to grow from 760,000 housing units in 1984 to 1.2 million in the year 2010, an addition of 464,000 housing units during the 26-year period. This growth represents 17% of the region's projected housing growth--a smaller share than the 27% captured during the period between 1970 and 1984.

Orange County had 1,048,000 jobs in 1984, or 18% of the region's total employment. By 2010, the county is projected to add 877,000 jobs (87% increase), which is about 29% of the projected regional increase in jobs between 1984 and 2010. By 2010, Orange County's employment is projected to be 1,925,000. Orange County will account for 22% of the region's total employment, a slight increase in its regional share from 1984." 15

However, 2010 projections for the preferred GMA-4 Modified Job/Housing Balance Alternative (Jobs/Housing concept is to provide a comparable ratio of jobs and housing within a community/region to not necessitate unnecessary mobility requirements) indicate the following projections for Orange County between 1984 and 2010 under The Trend Projection:

Population:	2,982,200
Housing:	1,191,900
Employment	1,691,800

The preferred GMA-4 Modified Job/Housing Balance Alternative projects less population, housing and employment (117,800, 8,100, 233,200, respectively) for Orange County than the baseline projection identified above. This inconsistency should more clearly be addressed.

3. Without specific data on Anaheim, it is impractical to determine the impact on public services and infrastructure in Anaheim. If this Plan is adopted and implemented, what impacts on Anaheim's infrastructure/services will occur (i.e., water, wastewater treatment, solid and hazardous waste, energy, school facilities, circulation systems, etc.) and how would improvements found necessary be funded? As stated previously, the Plan should provide information enabling local jurisdictions to analyze said impacts. 16
4. Many of the policies set forth in the Growth Management Plan are ambiguous and unclear. It is difficult to provide comments on behalf of Anaheim due to the generality of the document. The document should specifically identify the cities in each county and subregion and indicate whether SCAG currently views each as job-rich, job-poor, housing-rich, or housing-poor. Specific comments cannot be offered until that effort is completed. Each policy is listed below with departmental comments in brackets following each policy. 17
 - o "Achieve better job/housing balance at the subregional level. Encourage and provide incentives in job-rich subregions to attract housing growth; and encourage and provide incentives in housing-rich subregions to attract job growth." 17
[It is not clear, based on the current Plan, whether Anaheim would currently be viewed by SCAG as job-rich or job-poor and housing-rich or housing-poor. The implied outcome could negatively affect Anaheim's future development/economic viability.]
 - o "To the degree possible, achieving a balance (by subregion) of the type of jobs with the price of housing." 17
[How will this be achieved and who will have the authority to determine appropriate pricing?]
 - o "Encourage employment development in job-poor localities through support of labor force retraining programs and other economic development measures." 17
[How will this be accomplished and what economic development measures will be employed?]
 - o "To the extent possible, reflect current local jurisdictional policies related to population, housing and employment in the development of job/housing balance targets." 17
[The current array of local jurisdictional policies relating to the accomplishment of jobs/housing balance targets is not documented.]

5. Many of the implementation processes identified are ambiguous and unclear. Again, it is difficult to provide comments on behalf of Anaheim due to the generality of the document. The document should specifically identify the cities in each county and subregion and indicate whether SCAG currently views each as job-rich, job-poor, housing-rich or housing-poor. Specific comments cannot be offered until that effort is completed. The various components of the identified implementation measures are listed below with departmental comments in brackets following each implementation measure.

- o "Local jurisdictions should develop general plans that incorporate regional and local job/housing balance objectives as well as elements of the Air Quality and Regional Mobility Plans. Local jurisdiction adoption of measures and ordinances that foster job/housing balance is targeted for January 1, 1990."

18.1

[If the City is directed to amend Anaheim's General Plan per the GMP, the City could potentially lose its discretion on the future shaping of Anaheim as related to some of the Vision 2000 (Strategic Planning) Strategies. Further, staffing and the cost to accomplish suggested General Plan amendments are undeterminable at this time.]

- o "SCAG's task is to promote implementation of the job/housing balance policy. The A-95 Review program is a vehicle through which the agency can review projects and make recommendations for federal funding. SCAG can influence the issue of federal resources to a project which adversely impacts the job/housing balance in a subregion. The Transportation Improvement Program is another mechanism that can be used by the agency. SCAG can recommend that funds for transportation projects be consistent with the objectives of the job/housing balance policy."

18.2

[It is unclear at this time how this Plan could affect Anaheim's potential funding from various sources for future projects.]

- o "County Transportation Commissions can participate in the implementation process through programming of transportation funds. By making revisions to the New Source Review Rule, the South Coast Air Quality Management District can influence the location of proposed commercial and industrial projects in a way that enhances the objectives of job/housing balance and eases attainment of subregional targets."

18.3

[The City potentially could lose its ability to determine its destiny regarding location of commercial and industrial projects. If it is determined that commercial and/or industrial development should not occur in Anaheim due to the job-housing balance, Anaheim's economy could be affected?]

Assessment of Consistency with Targets (proposed evaluation criteria)

- o "Projects which should be exempt from the review and mitigation process are proposals for low-income housing, for senior citizen housing and proposals to add needed jobs in economically depressed areas."

[Projects in the City of Anaheim may or may not be exempt as criteria for low-income housing is not identified. Also, projects of this nature typically require mitigation measures to protect the health, safety and general welfare of the City depending on the location and magnitude.]

- o "Projects which the local jurisdiction wishes to approve, but which exceed local targets and contribute to job/housing imbalance at the subregional level could require conditional permits until mitigation measures that bring the subregional job/housing balance within the targeted ratio are met."

[It is not clear whether SCAG currently views Anaheim as a targeted area of job/housing imbalance or not. If Anaheim is designated a targeted area of job/housing imbalance, who will direct or advise such stated actions or implementation measures and where will funding come from? Further, how much additional time will requested approvals take? Who will review for Plan consistency? Will the City be able to respond to comments and/or what role will the City play in the decision-making process?]

- o "Housing projects in job-rich subregions and job development projects in housing-rich subregions should not be subject to review and conditional permitting as long as they contribute to further balancing at the subregional level. Such projects should be encouraged and granted additional incentives."

[It is unclear whether SCAG currently views Anaheim as job-rich or job-poor. If projects in these areas are not subject to review and/or conditional permitting, how will infrastructure be determined and accommodated, and further, funded?]

Local Government Implementation Measures

- o "For proposals that worsen the job/housing balance in a subregion, require mitigation measures to be borne by the project."

[What type of mitigation measures? Should a balanced community be penalized for imbalances in the remainder of the subregion?]

- o "Establish regional and local priorities for building the infrastructure needed to support job/housing balance."

[This measure may require inter-agency coordination which could be sensitive and difficult to accomplish and enforce from a practical standpoint. Who will determine the priorities and on what criteria will they be based?] 18.8
 - o "Target basic industries. This is a tool which can be used by job-poor localities to identify growing industries and attract them by providing the proper incentives, such as tailoring their economic activities to the industries' requirements." 18.9

[Will industries in Anaheim be tempted to relocate, and if so, how would that affect the current economic balance of the City?]
 - o "Encourage housing development in job-rich subregions in accordance with allocations in the regional housing needs assessment by providing developers with additional incentives." 18.10

[What type of incentives?]
 - o "Reduce housing construction limitations in job-rich areas." 18.11

[What type of housing reduction measures are suggested? This measure could impact the quality of housing built.]
 - o "Link the transportation demand management measures to the job/housing balance measures." 18.12

[What is envisioned with this policy?]
6. How were the models derived and what data from what sources were used? The documentation does not clearly indicate. What assumptions were used? A listing should be provided. 19

OVERVIEW/SUMMARY

As indicated in previous comments, this Plan should include identification of more specific information with respect to the City of Anaheim regarding the potential impact upon our current policy direction toward economic development, business growth, land use opportunities, building activity, housing and employment opportunities, impacts upon the population growth and the Zoning Code and current goals of the General Plan. It is unclear what control or discretion the City of Anaheim will have in directing the future destiny of development in the City. It is also unclear which implementation measures would affect Anaheim dependent upon the City being classified as either job-rich or job-poor and housing-rich or housing-poor. The Plan should identify SCAG's perspective regarding these classifications. Other questions such as why a balanced community should be penalized for imbalances in the remainder of the subregion need to be addressed? It is recognized that the City should cooperate in the regional setting to address regional issues. However, development in Anaheim could be directly impacted upon this Plan's implementation.

Implementation measures suggest the General Plan and possibly the Zoning Code be amended to accommodate measures identified in the Plan. Further, the development approval process could be lengthened through implementation measures identified in this Plan. Revenues from Planning Department functions may decline while costs rise to implement proposed measures. Increased staffing levels could be necessary to implement the Plan.

The proposed Plan appears ambiguous, altruistic and contains a number of measures that could have adverse impacts upon local decision-making. It is not stated how many of the programs or infrastructure improvements will be accomplished or funded, or how this Plan could impact various funding sources to the City. Anaheim's balanced economy could be negatively affected through implementation of the Plan. Certain implementation measures could negatively impact the quality of housing built and associated pricing. Adjacent communities and cities in the region/subregion could be placed in conflict with one another due to implementation of this Plan.

DRAFT REGIONAL MOBILITY PLAN

In a cursory review by City staff, the following comments/issues have been raised regarding the Draft Regional Mobility Plan:

- o The Regional Mobility Plan states that transit usage will increase by 19% by the year 2010, however, it does not state how this will occur. To state that transit usage will be tripled without indicating the proposed strategies, marketing of those strategies, and the related funding is, to say the least, "a clouded point."

- o Reference is made to demand management strategies and centers indicating alternative work schedules and telecommuting as a means of reducing home-to-work person trips. However, implementation procedure is not suggested or mentioned. These strategies will create up-front costs on the part of many businesses and their operating procedures. Again, economics and practicality do not seem to be considered in the Plan. 22
- o The recommended mitigation measures state that no regionally significant adverse impacts are expected, however, there are some impacts that are local in nature that do not require mitigation. Regardless, local adverse impacts will need mitigation. Since the Regional Mobility Plan DEIR is an environmental impact report, it seems as though mitigation measures should be recommended to remedy adverse impacts. To state that the adverse impacts are local after being created by a regional plan does not seem accurate - especially for freeway widening/construction projects. 23

In conclusion, on behalf of the City of Anaheim, I would like to strongly urge that SCAG seek a forum by which public and private entities may assist in revising the proposed plans to further develop and enhance regional planning issues in a coordinated, multi-jurisdictional, and all-encompassing fashion.

Again, thank you for the opportunity to review these plans.

Sincerely,



BOB D. SIMPSON
CITY MANAGER

BDS:KT:mlf

c: City Council
OC City Managers
OC Division, League of California Cities

1497W

RESPONSES TO THE COMMENTS OF THE CITY OF ANAHEIM

12. See Response 1.
13. As stated on page 1-2 of the DEIR, State CEQA Guidelines require that EIR impact analyses correspond to the degree of specificity involved in the underlying activity being analyzed in the EIR. Due to the programmatic nature and regional scale of the GMP forecast, impacts related to the Draft GMP are assessed at a regional level. Local impacts can be more appropriately addressed at a local level.
14. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
15. The baseline projections described in Chapter III of the GMP is the same as GMA-1 (or No-Project Alternative) evaluated in the GMP DEIR. The recommended alternative discussed in Chapter VII of the GMP is the same as the proposed project (or GMA-4 Modified Jobs/Housing) evaluated in the GMP DEIR; SCAG's Executive Committee has selected this alternative as the preferred one.

GMA-1 is based on trends from 1970 to 1984. To incorporate more recent data from 1984 to 1988, GMA-4 Modified Jobs/Housing was developed reflecting a jobs/housing balance policy, thereby increasing population and housing and lowering employment relative to the trend projection.
16. See Response 1.
17. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
18. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
19. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
20. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
21. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
22. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
23. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.

Memorandum

To : State Clearinghouse
Office of Planning & Research
1400 10th Street
Sacramento, CA 95814

Attention: Keith Lee

Date : November 17, 1988

File No.: Riv-Var-Var
SBd-Var-Var
SCH# 88062924
SCH# 87121613

From : DEPARTMENT OF TRANSPORTATION
District 8

Subject: Southern California Association of Government's Growth Management
Plan and Regional Mobility Plan

We have reviewed the above mentioned project and offer the following comments:

Concerning the proposed facility improvements, the documents should state a tentative date for the implementation of the programs. In addition, the document should state whose responsibility the implementation of these programs will be, to insure that the improvements are built. 24

Lastly, individual notices for specific projects should be sent for review so that specific issues can be addressed. 25

If you have any questions, please contact Richard Malacoff at ATSS 670-4550 or 714-383-4550.

G. G. Visbal
GUY G. VISBAL
Chief, Transportation Planning Branch

RM:cj
bcc: GSmith, Plan Coord Unit, DOTP
Paul Hatanaka, SCAG

EL

NOV 17 1988

SOUTHERN CALIFORNIA ASSN.
OF GOVERNMENTS

RESPONSES TO THE COMMENTS OF CALTRANS, DISTRICT 8

24. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
25. Comment noted.



November 17, 1988

NOV 18 1988

Ms. Viviane Doche-Boulos
Southern California Association of Governments
600 South Commonwealth Avenue #100
Los Angeles, CA 90005

Dear Ms. Doche-Boulos:

I am writing in response to the SCAG draft Growth Management Plan, Regional Mobility Plan and associated EIRs.

My first comment concerns the inadvisability restricted review period for these several and closely related documents. A thirty day review is unprecedented in my experience for major projects of this nature. I was surprised to learn that SCAG would ask for a shortened review period and even more amazed that the State would give it serious consideration. Add to that the fact that review of all of these related documents needs to be complete in the same reduced time frame and it makes the task of my staff impossible. Therefore, I am formally requesting not only that the standard 45-day review be reinstated, but also that the review be extended by an additional 45 days as provided in CEQA. This request has already been submitted to the State Clearing House. 26

Given the fact that this request may not be granted, I will attempt to address our most significant concerns at this time. Many of these have already been addressed in our response to the South Coast Air Quality Management District in response to the proposed AQMP and associated EIR (see attached letter dated October 17, 1988.) Further review of SCAG's Growth Management Plan and Regional Mobility Plan leave us with greater rather than less concern about the central issue in this entire process, namely implementation.

Chapter VIII in the Growth Management Plan purports to address this issue; yet the reader is left confused by the ambiguity which one finds in this section. The statement is made on page VIII-1 that implementation strategy "...is based on the voluntary participation of local jurisdictions." Nevertheless, on pages VIII-3 and VIII-4 the same document outlines how SCAG, the South Coast AQMD, and other agencies could enforce these policies using A-95 Review, federal funding, New Source Review and other mechanisms. On page A2-5 (in Appendix 2, entitled Job/Housing Balance Strategies/Techniques) the following policy option is stated: "Local governments would be required to conform to SCAG recommendations on local proposals for development or changes in regulations." When confronted with this inconsistency, a member of SCAG's staff said, in effect, that the program would be voluntary unless jurisdictions do not to 27

Page 2
Viviane Doche-Boulos
November 15, 1988

comply. We find this a curious sort of voluntarism. In short, we continue to feel that these documents do not provide a clear notion as to what will be required of our City by these plans and what quid pro quo will be provided by other jurisdictions in order to achieve our mutual goal of clearer air. 27 Cont

There has also been recently adopted State legislation (Chapter 1568) which may give SCAQMD review power over indirect air pollution sources. We specifically ask whether this new power would be used to support the Growth Management Plan and Regional Mobility Plan. Furthermore, we would like you to explain how these programs can be considered voluntary if these new provisions are implemented. 28

Yours truly,

ONTARIO PLANNING DEPARTMENT
Joyce I. Babicz, City Planner



Austin Sullivan
Senior Planner

AES:rb

cc: J. Babicz
J. Freiman
J. Hamerslough



October 17, 1988

Ms. Suzanne Reed
Special Projects Coordinator
South Coast Air Quality Management District
9150 Flair Drive
El Monte, CA 91731

Dear Ms. Reed:

I am writing in response to the notice of completion for the EIR for the proposed 1988 revision to the AQMP.

I believe that the issue which creates the greatest concern in this jurisdiction, and, I suspect others, is that of enforcement. In reading these voluminous documents, there is no serious discussion given to the actions which might be employed to require compliance with specific policies of the plan. As I am sure you are aware, some of the proposals, especially in the supporting appendices to this document, are controversial and issues of implementation are central to the problem, not peripheral. In short, we do not feel that these documents give us a clear idea as to what will be required of this City by the plan and what quid pro quo will be provided by other jurisdictions. We have a difficult time supporting this open-ended approach to the problem.

Specifically, there are certain actions which this jurisdiction is unlikely to take even though we share the goal of clean air with the entire basin. For example, we have heard representatives from the State and SCAG propose, apparently seriously, such draconian measures as the issuance of occupancy permits before site plan review in order to stimulate housing formation in desired areas. As this pertains to the EIR, we ask, "How could one reasonably assess the likely impacts associated with this sort of abandonment of the standards which have heretofore been part of the normal review process?" We suggest that no such evaluation is possible. We also have serious questions about the advisability of pursuing further the jobs-housing balance strategy outlined in these several documents. The presumed goal of this strategy is to minimize average daily commuting distances which is, of course, desirable. Nevertheless, it would appear that the real problem is not housing availability. Rather the problem is one of cost. It is clear that, on a square footage basis, there is a general and rapid increase in the cost of housing as one proceeds westward from the Inland Empire into Los Angeles and Orange Counties. That situation is likely to obtain even if more housing is built in the western areas and more jobs are available in the east. As such, reduced commuting is not likely even if target goals are met. It is instructive that Orange County is presently in balance in the areas of jobs and

Page 2
Ms. Suzanne Reed
October 17, 1988

housing. Nevertheless, massive numbers of workers are exported each day to Los Angeles County and similar numbers arrive from the Inland Empire. This situation is likely to continue without large scale market intervention, a course of action which is not likely to be given serious consideration. Thus, there is no reason to assume that improved jobs-housing balance will reduce average commutes if the issue of cost continues to go unaddressed.

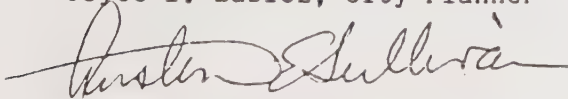
Moreover, the basic structure of the EIR is drawn into question because of the nature of the proposed AQMP, itself. Specifically, the AQMP proposes three tiers of policy with considerably different provisions. The third of these goes so far as to rely on technologies which may or may not be ready for implementation by 2010 A.D. Thus, the project, as defined by CEQA, is, and must be, illdefined. As such, the EIR cannot hope to adequately address the possible impacts associated with the plan. For example, the impacts associated with full electrification of transportation would be quite different depending on the means of generation used and the location of the generating facilities. Therefore, we suggest that additional environmental review will be necessary before any Tier III strategies are implemented.

Finally, the interrelatedness of these many and voluminous documents is unclear, at best. Moreover, not all documents have been distributed. We did not even know that there was a September, 1988 draft of the Transportation Land Use and Energy Conservation Measures document until Lloyd Zola of Planning Network chanced to inform us of its existence. The convoluted interrelationships of these various documents make a clear response to any of them more difficult.

If you have any questions, please call me at (714) 391-2506.

Yours truly,

ONTARIO PLANNING DEPARTMENT
Joyce I. Babicz, City Planner



Austin E. Sullivan
Senior Planner

AES:rb

RESPONSES TO THE COMMENTS OF THE CITY OF ONTARIO

26. See Response 1.
27. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
28. This comment does not relate to the adequacy of the GMP DEIR and is responded to in Appendix I of this report.



November 17, 1988

Mark Pisano
Executive Director
Southern California Association of Governments
600 South Commonwealth Avenue, Suite 1000
Los Angeles CA 90005

member
JOHN FLYNN
JAMES E. GORDON
VICKY HOWARD
MADGE L. SCHAEFER
DORILL B. WRIGHT

alternate member:

ROBERT C. EMBERTSON
MAGGIE ERICKSON
ALEX FIORI

executive officer:

ROBERT L. BRAITMAN

SCAG Draft Plans and EIRs on Regional
Mobility and Regional Growth Management

This is in response to your request to review the above referenced documents. Our comments are offered in the Commission's role as a responsible agency with respect to potential boundary changes which may result from the implementation of these Regional Plans.

DRAFT PLAN AND EIR ON REGIONAL MOBILITY

Resources - These documents should, at least for the Ventura County portion of SCAG, identify oil and gas, mineral (aggregate) and farmland resources. These represent an important part of Ventura County's economic base and the Draft EIR should evaluate projected impacts on these resources.

EIR Chapter 4.F Water Resources -The Project Impact/Growth Management section should address whether projected growth would exceed the firm and safe yields of existing water supplies (A crucial question in Southern California).

EIR Chapter 4.K Urban Form and Growth - Figures 22 and 23 incorrectly identify the North Half of Ventura County as "Housing Rich" when it should be identified as "Mountain and Desert". The North Half consists primarily of remote mountainous areas lying within the Los Padres National Forest.

This chapter should also contain an evaluation of how the Regional Mobility Plan will impact LAFCO adopted Spheres of Influence in Ventura County and the County's Guidelines for Orderly Development. Jurisdictional patterns within Ventura County, influenced by the Guidelines, are much different from patterns in the other Counties within the SCAG Region. These Guidelines provide the framework within which urban development is directed to existing cities whenever and wherever practical

Mark Pisano
November 17, 1988
Page Two

rather than providing opportunities for urban development to locate in the unincorporated area.

Draft Regional Plan - The Draft Regional Plan should also include a discussion of the Ventura LAFCO Sphere of Influence program and the County's Guidelines for Orderly Development.

EIR Chapter 4.L Regional Economy - The discussions in the Employment by Sector section on page 133 should identify each County's employment by Sector and their share of County employment in addition to employment in the SCAG Region as a whole. It is somewhat misleading to state, for instance, that Agriculture employs 70,000 (a 1% share of Regional employment) when this industry represents a much greater share of the Ventura County employment base.

29
Cont.

Please consider including in the Employment Centers section on page 134 a discussion of employment centers within Ventura County even though the employment densities are below 15,000 employees per square mile. The location of employment centers is significant when anticipated growth areas within the County are taken into consideration.


DRAFT EIR AND REGIONAL GROWTH MANAGEMENT PLAN

This Plan should also identify the above referenced issues and the Draft EIR should evaluate potential Plan impacts on these Ventura County resources, plans and policies.

30

We appreciate the opportunity to review these documents. If we can be of further assistance on this matter, please contact the LAFCO Office at 805/654-2576.

ROBERT L. BRAITMAN
Executive Officer


LYNNE W. KADA
Staff Analyst

RESPONSES TO THE COMMENTS OF THE VENTURA LOCAL
AGENCY FORMATION COMMISSION

29. These comments are related to the RMP and are responded to in the RMP/RMP FEIR.
30. Regarding oil and gas, aggregate resources, farmland, and water resource impacts of the GMP, see Chapters 6 ("Energy"), 11, 5, and 6 ("Water Resources"), respectively, of the GMP DEIR. Regarding impacts on the Ventura LAFCO Sphere of Influence, refer to the RMP/RMP FEIR for a discussion of this issue. Regarding impacts on Ventura County's employment centers, the GMP DEIR analysis focused on county-level and subregional impacts, consistent with the regional nature of the GMP.



THE IRVINE COMPANY

SOUTHERN CALIF. ASSOCIATION
OF GOVERNMENTS

November 18, 1988

NOV 18 1988

Mark Pisano, Executive Director
Southern California Association of Governments
600 South Commonwealth Avenue, Suite 1000
Los Angeles, California 90007

Subject: Draft EIR for the Draft Growth Management Plan,
October 1988

Dear Mr. Pisano:

We appreciate the opportunity to comment on the Draft EIR for the proposed regional Growth Management Plan. Our preliminary review of the document has raised several issues:

First, the regional Growth Management Plan is a key piece of regionwide information and guidance. As such, the document is far too important to be rushed through a thirty day review. Copies of the DEIR were not readily available to the public until well after the start of the comment period, which will greatly constrain SCAG's ability to correct errors, respond to legitimate public concerns, and refine the Growth Management Plan.

31

Second, the baseline against which jobs/housing balance impacts have been measured in the DEIR is not the same as that used for modelling the transportation impacts of GMA-4 Modified, the preferred growth projection. Thus, it is impossible to tell how much of the VMT reduction and other benefits attributed to GMA-4 Modified are actually due to attempts to balance jobs and housing, and how much is due simply to the difference in baseline. This is a fundamental problem that should be addressed in the DEIR.

32

Third, the DEIR does not examine any alternative configuration of subregions. All seven alternative growth projections are disaggregated into the same subregions, which are strongly shaped by political boundaries rather than housing and employment market areas. What are the impacts of jobs/housing balance if the subregions are defined differently? Subregional impacts are not presented in sufficient detail for a clear understanding of the changes that would occur under each of the alternatives.

33

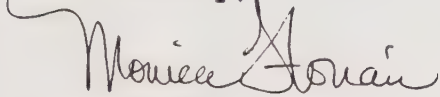
Fourth, the DEIR should discuss the impacts of the alternative projections on wage-earners per household. This measure of jobs/housing balance, a critical indicator of GMA-4 Modified's impact at both the regional and subregional level, is not addressed in the document.

34

In addition to these issues, we have outlined other concerns and issues on the attached paper.

We urge that these issues be fully addressed prior to adoption of the Growth Management Plan and certification of the EIR.

Sincerely,



Monica Florian
Vice President
Resource Entitlement

MF/ah

COMMENTS OF THE IRVINE COMPANY ON THE DRAFT SCAG GROWTH
MANAGEMENT PLAN EIR

DEIR Page TIC Comments

pp. 2-3 TIC supports the "Policies" listed on these two
to 2-4 pages.

35.1

p. 2-5 TIC strongly disagrees with the concept of defining
5-year jobs/housing targets by subregion. The notion
of mandating specific growth levels and "trading"
proposed "subregional allocations" is a flawed
strategy and will not achieve SCAG objectives for the
following reasons:

(1) Market Forces Shape the Evolution of Employment
Centers. It is simply not possible to
"mandate" employment-generating development
because such development is responsive to
factors such as composition of labor force
synergistic presence of similar industries
(e.g. high tech industries, finance), proximity
of major universities, proximity to airports,
etc. This is particularly true for high tech
industries which evolve in response to specific
types of labor force/synergy relationships. As
the County of Orange comments on the draft AQMP
have noted, a job shifted away from Orange
County may be more likely to end up in Silicon
valley or Singapore than in areas "targeted" by
SCAG for employment growth.

35.2

(2) Implications of Shift to Information/High-Tech
Economy.
As is noted in the draft RMP EIR: "Over the
past decade, there has been a dramatic shift in
the Southern California economic base. The
region has been undergoing a transition from a
goods-producing, manufacturing economy to an
information-based service economy. This shift
in the character of the Southern California
economy means that "most high-tech, high-skill
sectors within the service sector (e.g.
business, computer, legal, and health services)
are predicted to grow rapidly." "Employment
growth is expected to shift from industries
with a high proportion of low-skilled jobs to
industries with proportionately more
high-skilled jobs." (GMP EIR at p. 4-17).
This shift in the profile of the future labor
force means that the demand for housing will
reflect the desire of employees to live in
close proximity to the high-tech, information

industries of Orange County and Los Angeles. Accordingly, SCAG policies each sub-region rather than trying to shift jobs away from the areas that form the foundation of the high-tech/information industries.

- (3) Pacific Rim Orientation of Orange County. Although the Pacific Rim orientation of Los Angeles County is evident to most observers (e.g. the ports of Los Angeles/Long Beach, LAX), Orange County has also emerged with its own Pacific Rim relationships. The growth of TIC's Spectrum development has been strongly influenced by the presence of Pacific Rim companies with an even stronger emphasis projected for the future. This orientation and influence on employment growth is dependent on locational and synergistic relationships that cannot be exported to inland areas of the SCAG region through "allocations" of future employment.

35.2
Cont.

- (4) Orange County is Projected to Continue to "Export" Workers. The County of Orange comments on the draft AQMP have portrayed the manner in which actual commute patterns show that more Orange County residents commute out of the county than do residents of other counties commute into the County. The graphics portrayed in Figures 7-3 and 7-4 corroborate the County's assertions. In this context, it would seem that more employment should be encouraged to locate in Orange County in order to provide jobs for County residents rather than shifting projected employment out of Orange County.

Thus, in our view, an air quality strategy focussing on quantitative shifts of employment from one portion of the SCAG region to another is contrary to the fundamental shifts in the Southern California economy noted in the DEIR itself and is not capable of being implemented. Rather than mandating regional shifts in housing and employment, the focus of the jobs/housing strategy should be to achieve jobs/housing balance in areas where market forces are determining the location of employment development. A jobs/housing balance standard could be defined that would serve both as a clear focus for the regional growth management/air quality strategy and as an objective performance standard by which local efforts to implement the regional strategy can be measured.

35.3

- p. 4-11 Despite the obvious planning implications of differing DOF and SCAG projections for future employment and housing, the DEIR does not proposed any specific resolution of the differences in DOF and SCAG projections discussed in the text. 35.4
- p. 4-19 TIC supports the proposal to "increase the amount and density of planned future residential development" in housing-poor areas.
- p. 4-20 The proposed developer fees on commercial and industrial development in "job-rich subregions" would undermine the high-tech/Pacific Rim orientation of our economy and basically penalize industry for responding to real market forces and creating a vital economy. Instead of punitive measures, positive jobs/housing balance incentives should be provided. 35.5
- p. 4-20 TIC strongly opposes the proposal for "restricting economic development in job-rich areas" for the reasons cited in our comments relating to the proposed policy to establish employment generation targets.
- p. 4-20 TIC supports the concept of removing fiscal barriers to housing development and encourages the consideration of intraregional revenue-sharing or other measures that would counter the effects of fiscal deterrents to residential development.
- p. 4-22 The DEIR states that the most adverse effects of GMA-1 would occur in Orange County. TIC believes that the SCAG jobs/housing balance assessment does not adequately reflect the high ratios of employed persons per household experienced in central Orange County over the past decade. The reality of two wageearner households is such that rations of jobs/household are not accurate indicators of labor force participation in relation to housing. This conclusion is also contradicted by the DEIR's own figures regarding the flow of Orange County workers to Los Angeles County employment locations discussed above. 35.6
- p. 4-25 Given the high-tech/information services/Pacific Rim focus of much of the employment generation in Orange and Los Angeles Counties, it is simply not possible to state that "the proportional distribution of employment among industrial sectors is assumed to be similar for all alternatives. 35.7

RESPONSES TO THE COMMENTS OF THE IRVINE COMPANY

31. See Response 1.

32. The DEIR compares GMA-4 Modified Jobs/Housing against both GMA-1 (No-Project Alternative) and 1984 (Existing Conditions). The jobs/housing impacts of GMA-4 Modified Jobs/Housing are compared to GMA-1 on pages 2-27 and 2-28 of the DEIR, and to 1984 on pages 2-31 and 2-34. As noted on page 2-35, as compared to GMA-1, the jobs/housing component of the proposed project lessens the imbalance in all SCAG counties, except Imperial County and in the three sub-regions.

The transportation impacts of GMA-4 Modified Jobs/Housing are compared to GMA-1 on pages 7-27 and 7-28, and to 1984 on pages 7-17 and 7-18. As noted in the DEIR, the jobs/housing component of the proposed project reduces VMT by 29.4 million and vehicle hours of delay by 6.5 million, as compared to GMA-1. (See page 7-20 of the DEIR.)

33. The GMP DEIR examined the subregions identified in the GMP. For purposes of comparing the impacts of alternative population, housing, and employment distributions, the configuration of subregions was kept the same in the GMP. SCAG will prepare city forecasts, as noted in Response 14.

Since the DEIR is a regional study, it is general in scope and includes limited analysis of subregional impacts. Identification and evaluation of impacts in jurisdictions within the region should occur in subsequent environmental assessments for proposed land use plans, facility plans, and development projects.

34. The socioeconomic impacts of SCAG's plans have been studied as a separate effort. This study is available in the Draft AQMP FEIR's Appendix F, entitled "Direct and Indirect Socioeconomic Impacts of the AQMP."

35.1- These comments are related to the merits of the Draft GMP and are
35.4. responded to in Appendix I of this report.

35.5. This grocery list of measures is presented in the DEIR as optional measures that local jurisdictions can choose to implement if it is determined that they would best achieve jobs/housing balance.

35.6.

- 35.7. This statement in the DEIR refers to the assumption that the growth in the proportional share of employment in the services sector and the decline of the proportional share of employment in the manufacturing sector are likely to be similar for all the alternatives. This statement does not refute distributional differences among counties nor the fact that each alternative projects a different level of employment in each county. The amount of absolute employment growth in high-tech industries under each alternative would be related, in part, to total employment growth in Los Angeles and Orange Counties.



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-4998
Mailing Address: P. O. Box 4998, Whittier, CA 90607-4998
Telephone: (213) 699-7411, (213) 685-5217

November 21, 1988
Charles W. Carry
Chief Engineer and General Manager

File No: 31-230.70

Mr. Mark Pisano
Executive Director
Southern California Association of Governments
600 South Commonwealth Avenue, Suite 1000
Los Angeles, CA 90005

SOUTHERN CALIF. ASSOCIATION
OF GOVERNMENTS

NOV 22 1988

Gentlemen:

Draft Growth Management Plan and Draft EIR SCH No. 88062924

The following comments are submitted in response to your request for review of the Southern California Association of Governments (SCAG) Draft Growth Management Plan and associated draft environmental impact report (DEIR).

DRAFT GROWTH MANAGEMENT PLAN

1. The Growth Management Plan (GMP) provides useful data on housing and population trends in Los Angeles County as a whole. However, its utility to the Sanitation Districts will be severely limited unless the data is sufficiently disaggregated so that the projected wastewater conveyance and treatment needs of the areas served by the Districts can be determined. For example, the GMA-4 Modified Job/Housing Balance Alternative projects an average daily wastewater flow (ADWF) in Los Angeles County of 1331 mgd by 2010, a population of 10.2 million people, and a housing stock of 3.9 million units. Without knowing how much of this growth is projected for communities within the Sanitation Districts, and how this growth is planned to be distributed among the Districts, it will be impossible for the Districts to effectively evaluate the infrastructure needs for specific service areas which will be required to support SCAG's recommended alternative. Consequently, SCAG needs to disaggregate the forecasts based on the boundaries of the Sanitation Districts' Joint Outfall, Santa Clarita Valley, and Antelope Valley service areas.
2. The Sanitation Districts believe that the presentation on the disparity between the current wastewater conveyance and treatment facilities in the region and those anticipated to be required in the future is misleading. Because of the 1985 cut-off date for obtaining data, the GMP does not account for recently-initiated expansion projects. In addition, the GMP only considers projects which have been "funded". However, it does not consider systems such as the Districts' Connection Fee Program, which collects monies as new or expanded connections to the sewerage system are made and, thus, automatically funds the next increment of expansion. Hence, the Districts believe that the 2010 estimated wastewater treatment capacity "shortfall" is grossly overstated. SCAG should clarify its discussion of the impacts of the recommended alternative on wastewater treatment systems in the region by stating that, while projected growth will cause a substantial increase in the wastewater that must be treated in the region by 2010, steps are being taken by area sewerage agencies to expand treatment capacity and to maintain compliance with environmental standards.

37a

All of the Sanitation Districts' treatment facilities operate in conformance with all applicable water quality regulations for ocean disposal, riverine discharge, or wastewater reclamation and reuse. The GMP implies that full secondary treatment is the minimum acceptable level of wastewater treatment. However, it should be noted that Section 301(h) of the Clean Water Act does provide a waiver from this requirement under certain circumstances. The Districts have applied for such a waiver and are currently awaiting its outcome.

3. Page III-4 states the estimated capacity shortfalls in Los Angeles County will be 12 percent, while page 3-1 of the Draft EIR states the shortfall will be 19 percent. Please reconcile this difference. 37a Cont.
4. The Sanitation Districts believe that the 1974 Areawide Waste Treatment Management Plan (208) should be updated in conjunction with the GMP. What is the current status of the plan update and how will concurrent planning be accomplished? 37b
5. As currently envisioned, the Growth Management Plan relies heavily on voluntary participation by public and local officials who must be "sold" on the GMP through an outreach program. Without accompanying legislative or regulatory action, many jurisdictions may choose not to participate in the GMP, and it may not be prudent for the Districts to utilize the GMP in subsequent planning decisions. 37c
6. It may prove difficult to accomplish the proposal made in the GMP to develop a favorable job/housing mix through the linking of regional and local development to prioritized infrastructure projects. Rather than using infrastructure to achieve the job/housing mix first, it seems more logical to prescribe the job/housing mix first and then properly plan for infrastructure. Regulating by infrastructure funding as suggested in Appendix I could result in new infrastructure consistent with the goals of the GMP, but greatly deficient in real needs if local development proceeds according to its own agenda. Furthermore, SCAG should investigate more thoroughly whether agencies primarily charged with regulating the discharge of pollutants within an area have the authority to carry out urban planning initiatives (e.g., if the Regional Water Quality Control Board can in fact impose a moratorium on sewer connections to improve the job/housing balance in an area -- as proposed on page VIII-5 -- if the sewerage system which serves the area is adequately protecting water quality). 37d

DRAFT ENVIRONMENTAL IMPACT REPORT

Wastewater Treatment

In reviewing the Wastewater Treatment Section (page 6-5), the Districts found the discussion difficult to evaluate due to the general overview approach taken. As indicated earlier, for the information to be of value to the agencies within the SCAG region, the data needs to be disaggregated. The Districts would then be able to determine how much of the estimated 209.1 mgd 2010 shortfall in Los Angeles County is attributable to Districts' facilities. Other points which make this section difficult to evaluate are as follows: 38

1. The Treatment Plant data is from 1985. By the time the Growth Management Plan is adopted and disaggregated data is available, the information will be five years old. Information regarding the Districts' facilities has changed significantly (see attached table). We can only assume that it has also changed for other facilities as well. 39
2. The statement (page 6-15) that "Since peak flows exceed average daily flows by as much as 25 percent, plants operating at 75 percent capacity often are considered in need of expansion", is not correct. The capacity of a treatment plant is defined as the average daily flow capacity. For example, the Districts' Joint Water Pollution Control Plant capacity is 385 mgd; however, the design peak capacity is greater than 385 mgd (540 mgd). Treatment plants are designed for peak flow, as is the case for Districts' facilities. 40
3. Table 6-2 (page 6-16) provides information of limited value and is somewhat misleading. It does not take regional systems into account whereby flows can bypass one plant and be treated at another. Because of this regional approach, some of the water reclamation plants (WRPs) are operated at full capacity by choice, and are not necessarily in need of expansion. Thus, the Districts recommend that capacity limitations and shortfalls be evaluated on a system-wide basis. The Districts operate two such systems in addition to three non-regionalized treatment plants. The Districts also recommend a complete list of treatment plants, capacities, current flow rates and proposed expansions might better serve the agencies in evaluating the data in this section. See the enclosed table giving pertinent information about the Districts' WRPs. 41

The Districts were unable to duplicate the 2010 wastewater treatment capacity of 1,122 mgd in Los Angeles County given in the table on the bottom of page 6-20. The Districts would like to obtain the breakdown of the data used to derive this 2010 capacity. 41 Cont.

4. The statement (page 6-18) that "three larger districts in Los Angeles and Orange Counties discharge into the Pacific Ocean and do not provide full secondary treatment, the minimum level of treatment required by law" is incorrect. Section 301(h) of the Federal Clean Water Act allows for the discharge of wastewater receiving less than full secondary treatment to the ocean. Related to the statement above is the idea that the shortfall in Los Angeles County would increase if "existing primary treatment capacity is converted to secondary treatment." As mentioned in the DEIR, the City of Los Angeles has agreed to provide full secondary treatment by 1998 without decreasing capacity. The Districts are currently awaiting a decision on a 301 (h) Ocean Discharge Waiver. In the event it is denied, the Districts will be required to expand the secondary treatment facilities to match the primary treatment capacity, and not decrease the overall capacity of the plant. 42

Solid Waste

1. While the Draft EIR acknowledges (somewhat belatedly on page 6-28) that the Solid Waste analysis does not take into account some of the considerations that influence the waste disposal crisis, including amount of waste disposed of daily at a site, size of disposal area, and disposal limitations specified in operating permits, comments which appear earlier in Chapters 3 and 6 are somewhat misleading. Clearly, there is a need to expand existing landfills, develop new landfills, and implement stronger recycling programs in Los Angeles County as indicated in Table 3-1 and in Chapter 6 under "Mitigation Measures". However, conclusions that "virtually all permitted landfill capacity for residential and commercial waste disposal could be depleted by the end of 1991" is inaccurate. If no expansions, development of new sites, or increased recycling are implemented, Los Angeles County will begin to experience a disposal shortfall by 1992. There would still be disposal capacity available (even through the year 2010), but no adequate daily disposal capability. The amount of disposal shortfall and the point in time at which it occurs is highly variable and dependent on the course of actions taken by various decision-makers in the County. Thus, it is not clear why the year 1996 is cited as the time of capacity depletion. 43

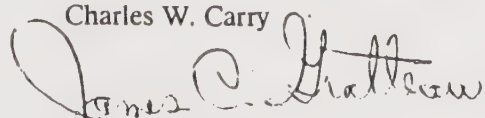
Additionally, it should be noted that lack of public and political support in conjunction with the current energy surplus has made additional implementation of refuse-to-energy unlikely in the near future. While air quality concerns are important factors, as indicated on page 6-25, air emissions control technology is available for meeting regulatory standards. 44

Lastly, it is not clear what "region" is being referred to in the section entitled "Impacts and Mitigation Measures" on page 6-25, since your disposal demand estimated 19.94 million tons per year (64,000 tpd-6) in 1984 is considerably more than COSWMP's 1985 estimate of 15 million tons per year (48,000 tpd-6). Where possible, the Growth Management Plan should differentiate waste generation regions and components of the waste disposal demand. 45

The Sanitation Districts hope that these comments will prove helpful to the Southern California Association of Governments in refining the Growth Management Plan and Draft EIR to best serve the needs of the region. If you have questions regarding this response or require additional information, please contact Paul Prestia at extension 2703 or Mark Spademan at extension 2720.

Very truly yours,

Charles W. Carry



James C. Gratteau
Head, Financial Management &
Grants Administration Department

JCG:ln

**LOS ANGELES COUNTY SANITATION DISTRICTS
WASTEWATER TREATMENT FACILITIES**

FACILITY	CURRENT CAPACITY (MGD)		CURRENT AVERAGE FLOW RATE* (MGD)	PROPOSED EXPANSION (PLANNED DATE ON-LINE) (MGD)
	ADWF	PEAK		
<u>Joint Outfall System</u>				
Joint Water Pollution Control Plant	385	540	371	---
Long Beach WRP	25	34	21	---
Los Coyotes WRP	37.5	60	34	---
Pomona WRP	10	14	9	5 (1991)
San Jose Creek WRP	62.5	90	64	37.5 (1991)
Whittier Narrows WRP	<u>15</u>	<u>20</u>	<u>13</u>	<u>---</u>
Regional Total	535	758	512	42.5
<u>Santa Clarita Valley Joint Sewerage System</u>				
Saugus WRP	5	9	4.6	
Valencia WRP	<u>7.5</u>	<u>15</u>	<u>6.2</u>	<u>6.0</u> (1992)
Regional Total	12.5	24	10.8	6.0
<u>Antelope Valley Plants</u>				
Lancaster WRP	6.5	11	6.4	3.5 (1990)
Palmdale WRP	5.5	9.9	4.5	1.5 (1990)

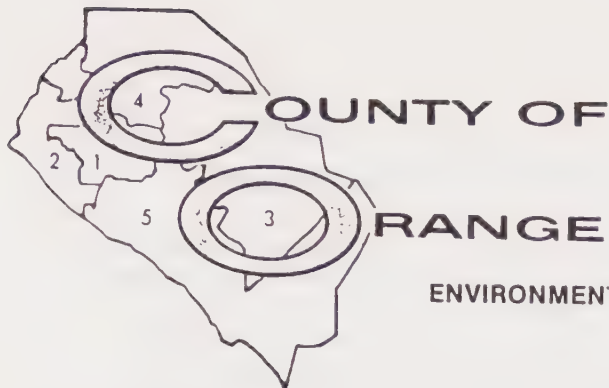
Note: Not shown is La Canada WRP which serves one small community and treats an ADWF of 0.11 mgd

*Annual mean for period 10/87 through 9/88

ADWF = Average Daily Wastewater Flow

RESPONSES TO THE COMMENTS OF THE LOS ANGELES COUNTY
SANITATION DISTRICTS

37. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
38. Since the DEIR is a regional study, it is general in scope and includes limited analysis of subregional impacts. Identification and evaluation of impacts in service districts and jurisdictions within the region should occur in subsequent environmental assessments for proposed land use plans, facility plans, and development projects.
39. Updated information on Los Angeles County treatment plant demand and capacity and proposed facility expansion is cited in the errata to page 6-15 of the DEIR.
40. The statement concerning treatment plant operating capacity has been amended in the errata to page 6-15 of the DEIR.
41. Updated information concerning the operating capacity of regional treatment facilities in general and Los Angeles County in particular is cited in the errata to page 6-15 of the DEIR. Comparable information was not provided for other counties in the region by SCAG or respective wastewater treatment districts.
- The Los Angeles County wastewater treatment capacity estimate shown on page 6-20 of the DEIR is based on existing and funded facility capacity as of 1985 (Southern California Association of Governments 1987, page 11-3).
42. Statements concerning compliance with Federal Clean Water Act discharge requirements have been amended in response to this comment, as indicated in the errata to page 6-18 of the DEIR.
43. The statement concerning projected saturation of Los Angeles County landfill capacity has been amended in response to this comment, as indicated in the errata to page 6-25 of the DEIR.
44. The statement concerning the feasibility of producing energy from solid waste has been amended in response to this comment, as indicated in the errata to page 6-25 of the DEIR.
45. The cumulative six-county SCAG region solid waste disposal estimate for 1984 shown on page 6-25 of the DEIR was provided by SCAG, based on a 1985 study by the California Waste Management Board (Southern California Association of Governments 1987, page 12-3).



ERNE SCHNEIDER
DIRECTOR, EMA

ROBERT G. FISHER
DIRECTOR OF PLANNING

LOCATION:
12 CIVIC CENTER PLAZA
P.O. BOX 4048
SANTA ANA, CA 92702-4048

MAILING ADDRESS:
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TELEPHONE:
(714) 834-4643

NOV 18 1988

Dr. Mark Pisano
Executive Director
SCAG

600 S. Commonwealth Ave, Suite 1000
Los Angeles, CA 90005

FILE
NOV 18 1988

RE: Comments on Growth Management Plan EIR

SCHNEIDER, ERNEST
DIRECTOR, EMA

Dear Dr. Pisano:

We have completed a cursory review of the Growth Management Plan Draft Environmental Impact Report. The comments are provided below. We would like to note that the 30-day timeframe given for the review of this type of document is both unrealistic and unreasonable. Substantial thought and effort went into the preparation of this document which took a lengthy period of time to compile. The jurisdictions which will be implementing this plan need more time to review this type of document since it will be these jurisdictions which will be most affected by the plan that is being proposed. Therefore, the comments provided below are necessarily brief and general in nature. 46

COMMENTS:

Page 2-4 Implementation Process: A bullet on this page reads that implementation presupposes the voluntary participation of local jurisdictions in the planning and implementation of the process. It is our opinion that this voluntary participation may be difficult to achieve in the short term, or at least until local jurisdictions can understand the ramifications and implications of the Growth Management Plan on their planning process. Certainly, the 30-day review process does not provide sufficient time to achieve any kind of substantive understanding. This issue and the ability to achieve voluntary participation should be explored at length in the EIR. 47a

Page 2-5 Assessment of Consistency with Targets: Significant incentives must be made available to the private sector to achieve the job/housing balance that's mentioned here as part of the implementation process, especially in the areas of low and moderate income housing. However, such incentives may not be adequate to overcome market forces which are more important in determining the distribution of land uses within jurisdictions. Specific incentives to achieve the job/housing balance should be listed and discussed. One other way of achieving a job/housing balance is by modifying components of local general plans which would re-distribute the existing pattern of land uses in areas that are as yet undeveloped. While such actions may make it possible to achieve job/housing balance, the real factors to achieving this are still governed by market forces and the availability of necessary resources. 47b

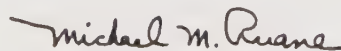


Chapter 3: Summary of Proposed Project Impacts and Mitigation Measures:

1. The required level of public services necessary to serve the projected level of development in the preferred alternative will be difficult to achieve without an infusion of financial resources. Such resources should be identified and discussed in this document. 48
2. Low-income housing in areas where land values are extremely high is difficult to achieve in the absence of direct government subsidies. This concern should be reviewed and discussed in this document. 49
3. Negative and positive inducements, including fees to achieve a more desirable job/housing balance should be discussed in greater detail. The concern here is that without a commitment and cooperation from all of the local jurisdictions within the SCAG region, such plans would not achieve the job/housing balance unless there is complete cooperation. Without such cooperation the result may actually be that some jurisdictions may end up with a more favorable tax base and more desirable working and living environment if it does not cooperate with this type of plan. 50
4. Discussion of growth management programs should also include the use of such programs as a monitoring device for development that has already been approved at the general plan and zoning levels. This would ensure that public facilities are in place in order to serve development as it comes on line. 51

In conclusion, any growth management plan should recognize that significant incentive or regulatory measures would be required in order to redirect market forces which govern growth and development. In general, this document does not provide adequate discussion of the funding sources and the implementation mechanisms necessary to achieve growth management objectives. We would welcome the opportunity to provide more thorough comments during an extended draft EIR review period.

Very truly yours,



Michael M. Ruane

Interim Director of Planning

JD:no/dsPA-28A/8322
8111706461682

cc: Board Offices
Director, EMA
CAO

NOTE: The County's comments on the Draft Growth Management Plan have been transmitted under separate cover from the County Administrative Office and are incorporated herein by reference.

RESPONSES TO THE COMMENTS OF THE COUNTY OF ORANGE
ENVIRONMENTAL MANAGEMENT AGENCY

46. See Response 1.
47. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
48. It is beyond the scope of the GMP EIR to identify specific financial resources for funding needed public services. Financing considerations will be reviewed as a part of project-specific evaluations.
49. The mitigation measures discussed on page 4-16 of the DEIR recognize the need for government subsidies to finance low-income housing. Financing sources that are mentioned include community development block grant and state housing program funds.
50. Pages 4-19 and 4-20 of the DEIR present a menu of possible strategies, including the imposition of fees, to achieve a more desirable jobs/housing balance. The impact of individual measures on specific jurisdictions will differ depending on the circumstances in the particular jurisdiction. Local jurisdictions should select those measures that best meet their needs.
51. As noted in Chapter 2 of this FEIR, Assembly Bill 3180, as passed by the California State Legislature in the 1987-1988 session, mandates that public agencies adopt a monitoring program for changes to projects which it has adopted or made a condition of approval to mitigate or avoid significant environmental impacts. Mitigation monitoring will be required on all projects approved after December 31, 1988.

NOV 22 1988

SOUTHERN CALIFORNIA ASSN.
OF GOVERNMENTS

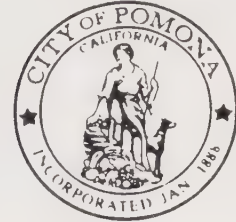
THE CITY OF POMONA

Office of the City Administrator

SANFORD A. SORENSEN
Deputy City Administrator/Development

November 18, 1988

Mr. Paul Hatanaka
Southern California Association of Governments
600 South Commonwealth Avenue
Suite 1000
Los Angeles, California 90005



RE: DRAFT ENVIRONMENTAL IMPACT REPORT AND GROWTH MANAGEMENT PLAN

Dear Mr. Hatanaka:

Thank you for the opportunity for review SCAG's Growth Management Plan and associated Environmental Impact Report.

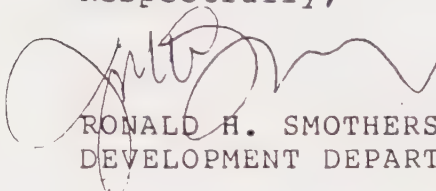
We are encouraged to see SCAG tackle the tough regional planning issues that confront our region. However, we maintain some concerns regarding the draft plan as it may impact the City of Pomona. While we endorse and promote the concept of a jobs/housing balance, we are concerned that the baseline data from which these projections are or will be made are predicated upon incomplete or erroneous information or assumptions about Pomona.

Specifically, we have recently completed a review of the Regional Housing Needs Assessment as it relates to the City of Pomona and found it in need of revision to accurately portray Pomona's development trends and land use capacity. And, since the RHNA projections are, in part, based upon the Growth Management Plan we believe that it too may require revision. The attached letter and supporting information sent to Mr. James A. Minuto, manager for SCAG's Housing Program, is illustrative of this point.

We believe that the trend projections for the East San Gabriel Valley, of which Pomona is a part, may need further review to determine their accuracy. Clearly, we are suggesting that this further review may establish a much more significant reduction in housing growth, augmented by a substantial increase in employment growth in the entire East San Gabriel Valley subregion over the projections made in the GMA4-Mod Job/Housing Balance. This, of course, assumes that other jurisdictions within our subregion may have similar reservations about the trend data.

We look forward to reviewing SCAG's Growth Management Plan as it is further refined. Please contact me should you have any questions regarding this matter.

Respectfully,

 for:
RONALD H. SMOTHERS, DIRECTOR
DEVELOPMENT DEPARTMENT

RHS/jt

Attachments

THE CITY OF POMONA

A. J. WILSON
City Administrator

Office of the City Administrator

September 28, 1988



Mr. Jim Minuto
Community and Economic Development
Southern California Association of Governments
600 South Commonwealth Avenue, Suite 1000
Los Angeles, CA 90005

Dear Mr. Minuto:

This letter is submitted to you in connection with our request to revise the "regional share" of new housing need that has been allocated to the City of Pomona. Over a 6-1/2 year time period, the Regional Housing Needs Assessment (RHNA) has allocated a need to the City of Pomona of almost 3,600 new housing units. Of this total need, the projected need for very low and low income households is 1,453 dwellings. We believe that the needs allocated to the City of Pomona should be revised because of the following factors:

1. The demand for housing experienced during the past decade does not approach the need allocated by SCAG (an average of 550 units per year).
2. The City can be considered a "highly impacted" jurisdiction as defined by SCAG. Our City is a "port of entry" for many low income households. Some of these households are residing in doubled-up conditions or in structures that do not meet housing code standards. Because of these factors, these households probably are not accounted in readily available data on population and income. Thus, our City is more severely impacted than the RHNA has considered to date.
3. Public services and facilities such as schools could be severely impacted if the need for low income housing is physically addressed within the City. This situation could result in serious overcrowding and an economically segregated school system.

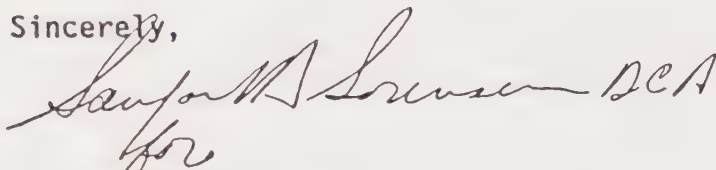
To remain consistent with the balance of the region, the City's share of regional housing need also should account for "latent" or "non-effective" demand. This latter category includes the "very low" and "low" income households. We understand that in the RHNA (page B-28) there is an "avoidance of impaction" adjustment for cities with an income distribution which exceeds the regional average of 40.2% of very low and low income households.

The City's percentage of lower income households, according to the Draft RHNA, is 40.4%. Thus, the estimate of a regional share for Pomona is revised from 3,599 to 2,727 distributed as follows:

Very Low	447	16.4%
Low	655	24.0%
Moderate	597	21.9%
Above Moderate	<u>1,028</u>	<u>37.7%</u>
	2,727	100.0%

If you should have any questions, please give me a call at your convenience.

Sincerely,

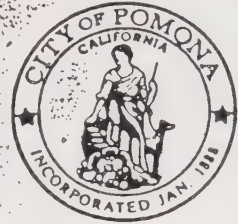
A handwritten signature in cursive script, appearing to read "A.J. Wilson", followed by the letters "DCA" in a more formal, blocky font.

A.J. WILSON
City Administrator

AJW/jjm

THE CITY OF POMONA

Office of the City Administrator



A. J. WILSON
City Administrator

October 21, 1988

Mr. James A. Minuto, Manager
SCAG Housing Manager
So. Calif. Association of Governments
600 South Commonwealth Avenue
Suite 1000
Los Angeles, CA. 90005

RE: Growth Constraints that Inhibit Development

Dear Mr. Minuto:

We have received your letter acknowledging the City's request to revise the Regional Housing Needs Assessment figures for Pomona. Thank you for the opportunity to submit supplemental information on the constraints which inhibit the potential for new construction in Pomona.

At the present time, the City has approved the development of 800 housing units which are to be absorbed during the next three to four years. The construction of these housing units consumes most of the remaining vacant land in the City which is readily developable. Other vacant land in the community which, from a location standpoint, is suitable for residential development also is situated within neighborhood environments that need improvements in order to attract private investors to build new housing.

Some of the improvements are of a public nature such as landscaping, block walls and curbs, gutters and sidewalks. In order to attract developers, other incentives or methods must be devised to facilitate new development. These incentives or methods are required in order to assemble lots and clear land, for example. This process, whether by private investors or redevelopment, usually takes a considerable amount of time.

We do not foresee the rate of recycling, even with substantial public investment, to exceed the 200 to 300 units per year level which has been experienced during the recent years. Because of all the foregoing, we would anticipate a realistic "share of regional housing need" for effective demand to be 1,625 dwelling units over a 6.5 year period (250 DUs per year x 6.5 years).

As noted by SCAG in the Draft Regional Housing Needs Assessment, there is a difference between "effective" and "latent" demand. According to this report:

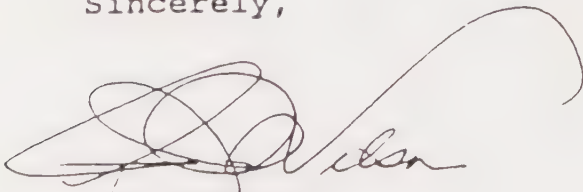
"Identification of Future Need for the higher income levels gives each jurisdiction an estimate of effective demand, or how much demand for housing there will be in the locality as a function of market forces. Future Need at the lower income levels is often largely latent demand, since such income levels, without subsidy or other assistance are often ineffective in causing housing to be supplied." (emphasis added)

The City of Pomona is currently in the midst of amending its twelve-year old General Plan. At this time, our efforts are focused upon amendments to the Land Use Element and the creation of a new Housing Element. This process has been guided to this point by several broad goals which I have included here to provide you with an overview of the context of this amendment process.

1. Eliminate overcrowding of schools and neighborhoods.
2. Encourage the recycling of older dilapidated rural housing into livable suburban housing.
3. Remove and prevent traffic/land use intrusions into residential neighborhoods.
4. Develop neighborhood stabilization and rehabilitation programs to increase the environmental quality of the City's residential neighborhoods.
5. Develop programs and land use strategies that capture the leakage of spendable income that presently leaves the City.
6. Balance the City's industrial sector by attracting clean, high tech industries.
7. Stimulate a healthy economy in order to:
 - a. Increase job opportunities, especially for under employed and unemployed residents;
 - b. Provide greater variety and convenience in all types of development; and
 - c. Strengthen the sales tax base of the City.

We appreciate the opportunity to comment on the RHNA and look forward to working with you during the next two months.

Sincerely,



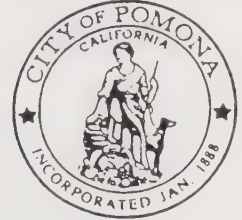
A.J. WILSON
City Administrator

THE CITY OF
POMONA

SANFORD A. SORENSEN
Director

Community Development Department

November 17, 1988



Mr. James A. Minuto, Manager
SCAG Housing Program
Southern California Association of Governments
600 South Commonwealth Avenue
Suite 1000
Los Angeles, California 90005

RE: REQUEST FOR REVISION TO THE REGIONAL HOUSING NEEDS ASSESSMENT

Dear Mr. Minuto:

This letter is a clarification of and a follow-up to our October 21, 1988 correspondence which presented various factors for the RHNA SUBCOMMITTEE'S consideration with respect to a revision for Pomona's future housing needs assessment.

We have received the staff recommendation regarding our request for this revision and want to clarify certain factors upon which our request is made. That recommendation intimates that "public improvements" is the sole constraint which lies behind the City's "appeal". Rather, we wholeheartedly agree with your statement in the staff recommendation that "availability of sites...is the determining factor here." And, we maintain that our original request is consistent with this finding as it relates to the availability of sites.

Attached you will find a table that illustrates the housing development trend in Pomona over the last eight years (Table 1). This table also illustrates the significant "bulge" in residential development resulting from the near-completion of the Phillips Ranch planned-community in Pomona during this same period. Specifically, you will note that Phillips Ranch has accounted for over 45% of Pomona's housing growth during this decade. This growth, however, is expected to eclipse during late 1989 as the last building permits for the "build-out" of Phillips Ranch occur. This build-out is simply a function of the supply of vacant land. We believe, therefore, that these "bulge" figures should be extracted from any trend projections because Phillips Ranch has resulted from deliberate although artificial City programs (i.e., redevelopment, mortgage revenue bonds, CDBG, etc.) to encourage provision for local and regional housing needs.

In excluding this "bulge" of residential growth, we firmly believe that growth trends indicate that our housing stock will be augmented by up to 300 dwelling units each year for the ensuing five-year RHNA period. This growth factor is borne out by

the past growth trends (see Table 1) and is further substantiated by Pomona's limited availability of suitable sites.

While the City is nearing completion of a parcel-specific land-use survey that will quantify all vacant land in Pomona, preliminary data suggests that the total area of all vacant land will amount to approximately 588 gross acres. This vacant land is widely scattered throughout the community and even includes those areas currently zoned (and better suited) to commercial or industrial development. Assuming this total area were developed exclusively for residential uses, and that those uses followed past residential patterns, the net increase would total 5622 dwelling units (see Table 2). The obvious flaw in this methodology is that not all of this vacant land will be set aside for residential development. Further, this methodology does not begin to address a future scenario where, in 1994 for instance, Pomona has little or no vacant land to satisfy all of its local and regional land use demands into the next century.

Another significant constraint which deserves consideration pertains to overcrowding in Pomona's public schools. At present, the Pomona Unified School District indicates that the community has a facilities deficit of 4 elementary and 1 high school to meet current enrollment demand. Until funding is made available to construct additional public schools, every additional dwelling unit adds to the severe overcrowding that pervades Pomona's public schools. And, even with unlimited funding opportunities from the State, it is unlikely that existing overcrowding conditions could be mitigated within the five-year RHNA period. It should be noted, however, that as this overcrowding is mitigated, the vacant land supply will be further depleted (the Pomona Unified School District estimates that between 80 and 100 acres of land will be necessary to accommodate the existing need for public schools).

Based upon our request for a revision to the RHNA allocation as outlined on October 21, 1988, and further described in this letter and accompanying information, we believe that Pomona's allocation should not exceed our previous estimate, distributed in numbers of dwelling units as follows:

Very Low	447	16.4%
Low	655	24.0%
Moderate	597	21.9%
Above Moderate	1028	37.7%
	2727	100.0%

Please note that while our requested revision represents a reduction in Pomona's housing allocation, we feel that it still is an

Table 1

RESIDENTIAL DEVELOPMENT ACTIVITY AS EXPRESSED IN BUILDING
PERMITS BY TYPE AND YEAR

Year	Single Family	Phillips Ranch	Duplex	Other	M. Family 3-4	5+	Demo	Total	Total w/o PR
1980	28	424	13	1	102	25	28	593	169
1981	9	412	24	5	93	66	32	609	197
1982	29	206	24	3	98	152	41	512	347
1983	102	375	4	9	36	191	34	717	342
1984	110	196	21	6	76	42	38	451	255
1985	102	133	30	1	39	200	41	505	372
1986	102	97	8	1	44	567	48	819	722
1987	45	551	18	2	34	306	61	956	405
1988*	63	130	4	1	89	95	48	382	252
Total	590	2524	146	29	611	1644	371	5544	3061
YEARLY MEAN =									616 340

Note: Single Family: d.u. built outside of Phillips Ranch
 Phillips Ranch: d.u. built inside of Phillips Ranch
 Other: Dwlg. Gained by move in or conversion

Source: City of Pomona Building Division Monthly Statistical
 Reports, 1980 through 1988

* Through October 1988

Table 2

THE TOTAL** VACANT LAND AS EXPRESSED
IN FUTURE HOUSING NEEDS CAPACITY

TYPE	PERCENT TOTAL STOCK	TOTAL (1988)	VACANT LAND	D.U. DENSITY/ ACRE	TOTAL DWELLING UNITS
SINGLE FAMILY	68.0		400.0 ac.	6/ACRE	2,400
LOW DENSITY	22.2		130.5 ac.	15/ACRE	1,957
MEDIUM DENSITY	9.8		57.5 ac.	22/ACRE	1,276
TOTAL	100.0		588.0 ac.		5,622

Source: Land Use Survey, City of Pomona Development Dept/
Castaneda Associates, November 1988

** This constitutes all vacant land in the City of
Pomona irrespective of location and adjacent uses



Pomona Unified School District

800 South Garey Avenue, P. O. Box 2900, Pomona, CA 91769 — (714) 623-5251

November 17, 1988

Konradt Bartlam, Senior Planner
City of Pomona
Community Development Department
City Hall, 505 South Garey Avenue
Box 660, Pomona, CA 91769

Dear Mr. Bartlam:

The District's current enrollment exceeds 25,000 and is currently growing at approximately 4% each year. District schools are overcrowded. Overall enrollment capacities were exceeded in 1984. Since that time the equivalent of four elementary schools have been installed on existing campuses using temporary classroom buildings. Over 27% of the District's classrooms are temporary. The capacity of most elementary schools to absorb further growth without expansion of permanent core facilities has been exceeded.

The District has recently received State approval for the advanced planning of four new elementary schools and one high school; however, this is based upon projections of current enrollment growth rates. Over 1,000 additional students must be permanently housed on existing campuses before any new schools will be occupied. Income from school developer fees is not sufficient to accommodate these additional students while meeting State matching-fund requirements. In addition, no funding is available to adequately house State mandated special education programs, or to complete State mandated replacement of temporary buildings not conforming to earthquake and/or handicap access standards.

The SCAG planning numbers for new housing development within the City of Pomona reflect an increase in the growth rate. Ironically, based on surveys of available properties and current zoning densities the majority of this accelerated growth would take place in the most overcrowded areas; in the areas where the District is most unable to respond to growth.

The District is unable to respond to the current rate of growth within available resources. An acceleration in growth will severely impact the quality of education which the District is able to provide. The District supports the City of Pomona's appeal to revise SCAG's current housing development planning numbers.

Sincerely,

Richard L. Donoghue
Assistant Superintendent
Business Services

RLD:LLG:dm

RECEIVED

NOV 17 1988

COMMUNITY DEVELOPMENT
— PLANNING DIVISION —

RESPONSES TO THE COMMENTS OF THE CITY OF POMONA

52. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
53. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.

City of Redlands



November 18, 1988

NOV 21 1988

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
600 S. COMMONWEALTH AVENUE, SUITE 1000
LOS ANGELES, CA 90005

Mr. Paul Hatanaka
Southern California Association of Governments
600 S. Commonwealth Avenue, Suite 1000
Los Angeles, CA 90005

Dear Mr. Hatanaka:

Thank you for accepting our comments on the Regional Growth Management Plan (DEIR). Our comments relate to the Regional Housing Needs Assessment component of the plan:

1. SCAG's methodology to determine regional and sub-regional projected housing need is inherently flawed because it is based on historical data biased with intra-regional transfers of demand. SCAG's method of determining future housing need relied on definitions which confuse housing need with housing demand. Those terms are undefined in Government Code Section 65584(a), which required that, "The distribution of regional housing needs shall....take into consideration market demand for housing..." The City of Redlands maintains that much of the Redlands housing need identified by SCAG based on historical trends is, in reality, the housing need of Orange and L.A. Counties transferred to Redlands because of the failure of those job-rich sub-regions to supply sufficient quantities of reasonable housing. Only a portion of the SCAG identified Redlands housing need will be actually generated in Redlands or its sub-region.

54

Do L.A. and Orange counties get credit for meeting future housing demand because they have historically transferred much of that demand to other sub-regions? By relying on historical trends to forecast future sub-regional needs, SCAG is acquiescing to the circularity that it professes to avoid. The concept of public welfare cannot be stretched to require cities to accept responsibility to meet housing demand that exists only because it has gone unmet within other sub-regions.

Page two

Mr. Paul Hatanaka

Southern California Association of Governments

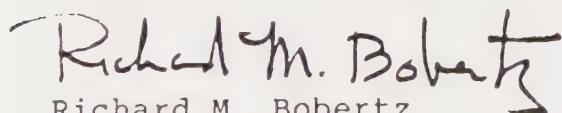
November 18, 1988

2. SCAG's future housing need projections are inconsistent with the Growth Management Plan goal of achieving a jobs/housing balance. SCAG methodology depends on continuing existing trends modified to approach a regional jobs/housing balance over a 100 year time span. (p. 2-10) There is no justification in the DEIR for setting the time span at such a long increment. In effect, cities that are able to approach JHB at a faster rate may be penalized for not being consistent with the RNHA numbers. 55

Your response to our comments will be appreciated. The general tone of the report which emphasises the necessity to break the current cycle and overcome the "business as usual" syndrome to achieve improvement in air quality and traffic congestion is applauded by the City of Redlands.

Sincerely,

Jeffrey L. Shaw, Director
Community Development Department



Richard M. Bobertz
Senior Planner

RMB:ep

RESPONSES TO THE COMMENTS OF THE CITY OF REDLANDS

54. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
55. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.

MAYOR
Dan Young
VICE MAYOR
Patricia A. McGuigan
COUNCILMEMBERS
John Acosta
Daniel E. Griset
Wilson B. Hart
Ron May
Miguel A. Pulido



CITY OF SANTA ANA

ALL-AMERICA CITY 1982-83

CITY MANAGER
David N. Ream
CITY ATTORNEY
Edward J. Cooper
CLERK OF THE COUNCIL
Janice C. Guy

November 18, 1988

NOV 22 1988

SOUTHERN CALIFORNIA ASSN.
OF GOVERNMENTS

Ms. Barbara Sullivan
Principal Planner
SCAG
600 S. Commonwealth Ave., Ste. 1000
Los Angeles, CA 90005

RE: COMMENTS ON THE OCTOBER 1988 DRAFT GROWTH MANAGEMENT
PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Ms. Sullivan:

Our review of the draft Growth Management Plan (GMP) and the draft Environmental Impact Report indicate that both documents raise the same issues and concerns. Therefore, the comments in this letter represent the City's response to both. City staff has done a necessarily cursory analysis of the GMP due to the short review period allowed by SCAG. It is our understanding that additional comments can be made at the December 15 public hearing prior to adoption of the plan.

The City of Santa Ana supports a regional approach to growth management and the need for coordination of land use goals and policies beyond local boundaries. The draft GMP indicates a growth management policy with a jobs/housing balance as the primary strategy, but implementation of this strategy involves many proposals that the City cannot support based upon the information contained in the plan.

Because of its size and location, Santa Ana is an urban center that has significant regional influence. It is the tenth largest City in the state, the fourth largest in the SCAG region and it contains 18 percent of Orange County's population, 16 percent of its housing and 23 percent of its jobs. It has a sizeable low-income and minority population. Santa Ana has recently been revitalized due to an extensive infusion of tax dollars and redevelopment efforts aimed at upgrading its economic vitality. Strict implementation of the measures proposed in this plan would erode the gains made in

56

this City and have a substantial impact on the County as well. As the County seat and one of its oldest cities, Santa Ana hopes to continue its revitalization and has already begun to implement many of the proposals recommended in the GMP.

Conceptually, we support the following proposals of the GMP.

- Regional planning coordination with local (subregional) agencies and SCAG.
- Regulatory strategies that allow a mixture of land uses and intensity regulations that would reduce travel demands.
- Legislative enabling acts to allow various alternative financial strategies such as interjurisdictional tax sharing and deferred taxation of undeveloped property.
- Strategies that address growth management at the local and regional level through the utilization of existing planning agencies.

56
Cont.

The following areas require additional clarification, impact assessment and regional consensus prior to being considered for adoption and local implementation.

- Authority for local land use decisions being made by regional or state agencies as proposed by South Coast Air Quality Management District for Indirect Source and New Source Review as a mechanism to force local compliance with GMP provisions.
- Implementation of the jobs/housing balance strategy with out any fiscal impact analysis by SCAG to determine local impacts.
- Implementation of the GMP using the proposed jobs/housing figures. This is a formula for failure because there is no disaggregation of the data down to the local level where it is to be implemented.
- The jobs/housing strategy goals are imprecise and therefore do not lend themselves to monitoring for successful implementation at the local level.

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Enclosed are additional comments that have been prepared by City staff. Please accept them as part of our official response to the draft Growth Management Plan and the draft Environmental Impact Report. Comments on the Regional Mobility Plan are being provided under separate cover.

Ms. Barbara Sullivan
Page 3
November 18, 1988

We applaud your efforts in establishing a coordinated regional approach to one of Southern California's major issues. If you have any questions regarding Santa Ana's comments, please contact Jill Wallace of my office at (714) 647-6900.

We look forward to working with SCAG to develop a locally sensitive plan for growth management.

Sincerely,

A handwritten signature in cursive script, appearing to read "David N. Ream", written in dark ink.

David N. Ream
City Manager

sl

cc: Mayor and City Council
Paul N. Hatanaka

MEMORANDUM

David N. Ream
City Manager



To: June Catalano, Exec. Dir.

Date: November 16, 1988

From: Planning and Building Agency

Subject: COMMENTS ON SCAG OCTOBER 1988 DRAFT GROWTH MANAGEMENT PLAN AND DRAFT EIR

The Draft Growth Management Plan (GMP) and the Draft Environmental Impact Report (DEIR) have been prepared by the Southern California Association of Governments and distributed for comments from local governments and affected agencies. Written comments on both documents must be submitted by November 18, 1988 in order to be included as a part of the public record. While they are not obligated to respond to comments received after this date, comments may be submitted up until December 15, 1988 when SCAG is scheduled to adopt the plan.

STAFF COMMENTS

Staff supports SCAG's growth management efforts and the need for coordinated and balanced management of land use goals and policies on a regional basis. Implementation of a growth management policy incorporating as its primary strategy a job/housing balance as outlined in the Growth Management Plan, however, raises a host of issues and concerns. The comments which follow indicate the areas of the plan that the City supports as well as those that we cannot support based upon the information presented in the plan.

The aspects of the plan that the City of Santa Ana supports are:

- o That investment strategies that realize objectives for downtown revitalization, housing subsidies, investment programs and employment/enhancement hiring programs be promoted.
- o That financial strategies such as deferred taxation on undeveloped land, revenue increment financing and interjurisdictional tax sharing be quickly pursued in the appropriate legislative channels.
- o That regulatory strategies such as mixing land uses and developing zoning and intensity regulations be utilized to reduce transportation demands.
- o That planning strategies for growth management be addressed at the regional as well as the local level through increased utilization of existing planning systems and cooperation among various planning agencies that adopt regional growth guidelines.

61

Staff was unable to provide a detailed analysis of the growth management plan and its Draft EIR in the short review time provided. As such, many questions were raised regarding the methodology and policy criteria that are not addressed satisfactorily by the plan. Based on our review the following concerns should be further clarified in the plan:

CONCERNS

1. Implementation of the Growth Management Plan and strategies to achieve a job housing balance can lead to a usurpation of local planning authority:

The Regional Growth Management Plan has, as its primary strategy the achievement of a job/housing balance throughout the region. This strategy was devised to lower trip generation thereby lessening transportation demand and consequently lessening potential pollution by locating jobs and housing in closer proximity.

The plan requires that local agencies pursue policy goals and redirect current regulations and create incentives to establish a better balance of jobs and housing. At issue are the various measures that are recommended to achieve jobs/housing balance targets. These measures include:

- A. Adoption of a regional planning element into local general plans.

Although adoption of a regional growth management element would have no direct legal impacts, state planning law requires that general plans remain internally consistent. Policies promoted in this element must be consistent or compatible with objectives, general land uses and programs specified in the plan. Adoption of a regional plan that is in conflict with goals and policies promoted at the local level could subordinate the local general plan to the goals of the regional element.

62a

- B. Local government and regional agency differences would be resolved by a third party.

Conflicts that arise between local governments and regional agencies concerning development of jobs and housing targets would be resolved by a third party. This would likely require a new agency and could hurt the promotion of economic development by adding a new level of bureaucracy and time delays to process discretionary or administrative actions.

62b

- C. Changes in redevelopment laws to require consistency between future redevelopment activities and a regional jobs/housing balance.

This strategy would specifically prohibit redevelopment activities in job rich subregions that would contribute to employment (jobs) increases above a target level. This has major implications for Santa Ana which is job rich and has a very active economic redevelopment strategy.

62c

- D. Changes in environmental regulations to support a job/housing balance.

The regulatory powers employed by Environmental agencies such as SCAQMD and environmental laws such as CEQA could be used to limit commercial development in job rich areas.

62d

2. No fiscal impact analysis has been conducted to determine the cost/benefit to cities or regions that will implement the growth management plan.

- A. Job rich areas may be discouraged from attracting economic activity that would increase its employment base. This strategy could have an adverse economic effect on cities or regions that need unrestrained economic development to enhance their tax base. This is especially true of older urban core cities whose aging infrastructure requires increased maintenance. The majority of the capital improvements budget for this maintenance comes from tax revenues on commercial/industrial projects.

- B. Revenue increment financing and interjurisdictional tax sharing strategies need to be implemented immediately and on a long term basis. The presumption that "job rich" areas are "tax rich" areas is misleading. Densely populated urban core cities such as Santa Ana which are job rich are not necessarily tax rich as they must meet financial obligations that are a result of increased public services brought on by high densities of population. It is necessary to offset the high cost of dense urban development by pursuing a vigorous economic base. Restrictions on a city's or region's ability to develop and maintain this base have socio-economic implications such as the loss of funding for needed physical and social infrastructure. The adverse impacts can be

63

mitigated through a tax-sharing agreement, however, no comprehensive legislative effort has been noted in the plan, although the housing/jobs balance objective has been implemented through the Regional Housing Needs Assessment (RHNA) which cities must incorporate into their housing elements. Cities cannot support increased housing densities without the economic base to pay for required physical and social infrastructure to support the increased population.

63
Cont.

3. Inadequate disaggregation of the jobs/housing balance targets proposed make implementation and monitoring vague and imprecise.

Monitoring of the jobs/housing balance target goals are to be conducted over a 5 year period (TIER 1). A subsequent review of the adequacy of programs, implementation measures and goals would be undertaken in TIER II. Staff has major concerns over the monitoring and implementation methodology. How are goals measured? Who measures them? How are they disaggregated to the local level? Where they are implemented?

The issue of subregions and definition of subregions has not been addressed in the plan. It is not clear if the participating agencies, cities and regions have input into the numerical sums that form the housing/job balance target goals.

64

SCAG has admitted to differences in the statistical methodology use to derive these goals. At issue is an inconsistency in statistical methodology that can insure a consistent, fair and equitable division of housing and job allocations. This must be further addressed in more technical appendices. In addition only one set of statistics (from a sample source) should be used for source documentation. This source should be adopted by SCAG, ratified by its members and be the preferred projections and statistics for the Growth Management Plan.

4. As a strategy is the jobs/housing balance attainable and will it have the desired effects?

There have been many questions raised concerning the jobs/housing strategy. If these issues cannot be addressed in a timely manner, support for the strategy will erode. The main premise of the success or failure of the Growth Management Plan is to move employment closer to housing and vice-versa. Many secondary and tertiary impacts have failed to be explained or analyzed in the Growth Management Plan. Among these are:

65a

- A. A preference for detached single family homes over attached homes. The availability of a higher intensity housing unit at a lower cost would not deter those who chose to live in areas that are far removed from their employment centers because of housing style preference. 65b
- b. Encouraging the relocation of economic activity to job poor areas to achieve lower travel demands may not be achieved if the economic activity is market specific (i.e., it depends upon location that is close to it primary market). Gains achieved in reducing traffic generation by moving jobs closer to housing would be negated if the goods and services had to be transported back to the market areas. 65c
- c. On a regional scale, spacial foundations of urbanism are sometimes predicated on a central place theory (i.e., those goods and services are located in a specific region to service the existing population). Artificially altering this free market theory may not be attainable as its success depends upon substantial government intervention in lifestyles and predisposed travel patterns. 65d
- d. Attainment of Growth Management Plan goals would entail a substantial amount of legislative effort at the regional and state level. Redirecting policies to create enabling legislation are key to the success of this plan. The dramatic short term changes the plan proposes preclude the adoption of changes needed at the legislative level. This could mean that implementation policies for the Growth Management Plan dealing with legislative changes might not be effective in the first five years of the plan and consequently should be given less weight in developing a clear growth management strategy. 65e
- e. The lack of available land to implement five year housing targets as proposed in the RHNA. As an urban core city, Santa Ana is predicted to reach full first level buildout in the next 10-15 years. Available land for housing will come through recycling efforts of aged housing stock and reclassification of existing industrial/commercial uses to residential. The availability of land to develop the type of residential units sought often in the market place is severely limited (single family detached). As such efforts to achieve the targets for housing forecasted in the Regional Housing Need Assessment can be expected to fall short. This will be compounded to the extent that other built-out cities have the same constraints. 65f

David N. Ream
November 16, 1988
Page 6

In conclusion, we would like to acknowledge the positive impacts likely to result from implementation of the GMP such as incentives for housing construction and rehabilitation, the development of regional planning goals, and an increase in the efficiency of existing transportation systems. However, in order for the plan to be successful in its goal of balancing jobs and housing in order to achieve the desired environmental and social benefits, there must be active participation and consensus among the local governments that will implement the plan. 65g

RESPONSES TO THE COMMENTS OF THE CITY OF SANTA ANA

56. Comment noted. See Responses 57 through 65.
57. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
58. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report. Fiscal impact analysis is not required by CEQA.
59. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
60. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
61. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
62. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
63. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report. See also Response 58.
64. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
65. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.



South Coast
AIR QUALITY MANAGEMENT DISTRICT

9150 FLAIR DRIVE, EL MONTE, CA 91731 (818) 572-6200

November 18, 1988

Mr. Paul Hatanaka
Principal Planner
Southern California Association of Governments
600 S. Commonwealth Ave. Suite 1000
Los Angeles, CA 90005

NOV 18 1988

Dear Mr. Hatanaka:

SOUTHERN CALIFORNIA A.S.G.
11/18/88

DRAFT ENVIRONMENTAL IMPACT REPORT ON THE SOUTHERN
CALIFORNIA ASSOCIATION OF GOVERNMENTS' DRAFT
GROWTH MANAGEMENT PLAN
SCAQMD# A81024C
SCH # 88062924

DRAFT ENVIRONMENTAL IMPACT REPORT ON THE SOUTHERN
CALIFORNIA ASSOCIATION OF GOVERNMENTS' DRAFT
REGIONAL MOBILITY PLAN
SCAQMD # A82024C
SCH # 87-121613

The Planning Division has reviewed the above documents and has the following comments:

GROWTH MANAGEMENT PLAN EIR:

AIR QUALITY

Both the 1982 AQMP and the Draft 1988 AQMP are used as separate criteria for judging the consistency of the GMP with the AQMP. The use of these dual consistency criteria is confusing and unnecessary. Reliance solely on the Draft 1988 AQMP is preferred, because: a) it is based on a more recent (1985) emissions inventory, b) it incorporates six more years' experience in the modeling and control of air pollution, c) it is a companion document to the Draft 1988 Growth Management Plan, and d) the 1982 AQMP has been invalidated in court.

Furthermore, the criteria levels in the 1982 AQMP are for the year 2000, not the year 2010, and are substantially above those of (they allow higher emissions than) the 1988 AQMP (with the exception of CO). Use of only the "target emission levels", i.e., emission levels which will just meet the federal standards, derived from the 1988 AQMP, would clarify the discussion of AQMP consistency of the proposed project and its alternatives considerably.

66

However, the "target emission levels" reported in the GMP DEIR are not consistent with the emission levels reported in the AQMP:

- o For ROG, the AQMP reports 200 tons/day, while the GMP DEIR uses 188 tons/day.

- o For CO, the linear interpolation used in the GMP DEIR to calculate the target emission level relies on a year 2010 emission value of 1890 tons/day, while the AQMP reports 1941 tons/day.

- o For NOx, the AQMP reports 242 tons/day, while the GMP DEIR uses 210 tons/day.

- o For SOx, the AQMP reports 30 tons/day, while the GMP DEIR uses 47 tons/day.

- o For PM10, the AQMP reports 1361 tons/day, while the GMP DEIR uses 603 tons/day.

Emission levels from the 1988 AQMP should be used. If not, justification for this divergence should be provided.

On p. 8-33 the following statement appears: "...it is unlikely that implementing these measures could result in ROG, NOx, or SOx emissions at or below the target levels." Since it is unclear from the context whether the measures referred to are those in the 1988 AQMP, the 1982 AQMP, or some other source, the implication of this statement is unclear. A more specific statement is needed.

ENERGY

The discussion in this section is out of date by about eight years. Data cited to characterize the energy setting of the Basin is generally from the late 1970's and early 1980's. The issues discussed are not current issues in energy planning. Furthermore, the section makes no mention of the AQMP's electrification strategy for the industrial sector, nor does it integrate AQMP measures for clean vehicle fuels into its projections. Specific comments are detailed below:

Electricity

1. Oil is not "the predominant fuel used in generating electricity" in the Basin. This statement was true a decade ago, but efforts by the Basin's utilities to convert oil-fired power plants to natural gas and to add coal and nuclear capacity have reduced their dependence on oil-fired generation to a minimal amount. Currently, oil is used only as a last resort, when natural gas is not available, or when oil-fired capacity is the last available capacity to meet

peak demand. The conclusion that "regional (electric) supply is highly sensitive to changes in oil prices and to potential disruption in oil supplies" is no longer true.

With regard to gas-fired electricity generation, the "highly variable" availability of natural gas has not been characteristic of the last ten years. Only in the unusually cold winter of 1987-88 were natural gas supplies to utilities curtailed. The subsequent coordinated effort by local government, the PUC, and utilities has established a plan for making such curtailments less likely in the future.

70
Cont.

2. A more current and more representative profile of the types of electric generation resources should be provided. For example, no mention is made of the significant role of coal and nuclear plants in the current supply mix. The EIR focuses on energy, as opposed to capacity aspects and provides insufficient discussion of current generating capacity and future capacity needs.

71

3. The role of several of the Basin's electric utilities is ignored. These include the municipal electric utilities of the cities of Anaheim, Riverside, Colton, and others. While these utilities purchase most of their power in bulk from Southern California Edison, some of them have become part owners of generation resources themselves and are engaged in significant purchases of power on the open market from both in-Basin and out-of-Basin generating plants.

72

4. The contribution of independent power producers, most importantly cogenerators, to energy and capacity supply should be discussed. Since these producers are being relied upon increasingly to meet future supply needs, recognition of their role is critical.

73

5. Better documentation for statements than personal communications is available and should be used. Examples are Basin utilities' 1987 annual reports, the CEC's Biennial Report, and the CEC's Electricity report.

74

Natural Gas

1. The data cited for out-of-state natural gas supply are out of date (1976-79). The natural gas demand data is also out of date (1980). The 1988 Gas Report (Southern California Utilities, 1988) contains 1987 data.

75

Transportation Energy

1. Although it is noted that "fuel economy of new vehicles has increased in recent years", no quantification of this important trend is given.

76

2. The data on fuel economy and gasoline consumption are out of date (1979). 77

Impacts

1. The beginning date for projections of energy demand and supply should be more recent than 1980. Data for 1987 are available directly from utilities and from the CEC. 78

2. What is the support for the statement that the utilities are expected to increase their reliance on nuclear power (p. 6-60)? No new nuclear power plants have been ordered by utilities for at least a decade, and scores of plants have been cancelled. The statement appears to be out of date. The long time frame (ten to fifteen years) needed in order to bring a nuclear plant on line suggests that nuclear power would not soon be able to provide a significant increase in Basin electricity supply. Although recent concerns with the atmospheric CO2 buildup have revived the consideration of nuclear power as a future supply option, this discussion is just beginning and has yet to result in new nuclear plant orders. 79

3. In order to demonstrate the increasing contribution of alternative and renewable electricity sources, the generating capacity and energy provided by these in 1987 should be reported, as should the capacity and energy projected from them in 2010. 80

4. On p. 6-60, the SCE and LADWP peak demands are reversed. 81

5. What are the implications for system reliability of a peak demand which is 95% of capacity? (p 6-60) 82

Mitigation Measures

1. The effect on energy demand and supply of the AQMP's Tier III electrification strategy is not considered, either in baseline projections or as a mitigation measure. Electricity consumption would increase dramatically if the strategy's measures for industrial and transportation electrification were followed. 83

2. Promotion of cogeneration as an energy impact mitigation measure is inconsistent with the AQMP's phasing out of in-Basin combustion processes. 84

3. Alternative and renewable energy sources are generally more capital-intensive than conventional energy sources, not less, as is stated on p. 6-61. 85

4. A 20% reduction in the region's electricity demand would equal 23,520 GWh/yr (20% x 117,600 GWh/yr), not 22,600 GWh/yr as reported. A 15% reduction in natural gas use 86

would equal 140.25 bcf/yr (15% x 935 bcf/yr), not 111.62 bcf/yr as reported (p. 6-61).

86
Cont.

IRREVERSIBLE ENVIRONMENTAL CHANGES

This section should be expanded to include impacts in addition to open space and construction resources. Growth on the scale envisioned would have impacts on natural habitats and endangered species, among others.

87

REGIONAL MOBILITY PLAN EIR:

1. Discussion of transportation energy use mitigation should include other clean fuels, such as compressed natural gas and liquefied petroleum gas.

2. The AQMP vehicle electrification requirements have been revised downward. Please see the forthcoming AQMP Final EIR for these revisions.

3. What is the source for the target dates of 1998 for 40% electrification/methanol fueling of passenger and 70% methanol fueling of heavy duty vehicles? Do these figures refer to new vehicles or to the entire vehicle stock?


88

3. Table 21, page 140, should have a column for accessibility in the year 2010 with no project.

4. The legend in Figure 11, page 50, needs additional explanation.

If you have any questions about the above comments, please call Robert Kneisel at (818) 572-2150.

Very truly yours,



Brian W. Farris,
Senior Air Quality Specialist
Energy and Environment Section

RESPONSES TO THE COMMENTS OF THE SOUTH COAST
AIR QUALITY MANAGEMENT DISTRICT

66. Refer to Response 80.

67. For ROG, 200 tons per day is the episode-based value identified in the September 1988 Draft AQMP (AQMP); 188 tons per day is the average daily value calculated from the 2010 baseline emissions estimated (identified on page 2-4 of the September 1988 AQMP Draft EIR [AQMP DEIR]) and the ROG emissions reduction estimate (identified on page 2-13 of the AQMP DEIR). The conclusions in the GMP EIR would not change given this different threshold.

For CO, the AQMP reports 1941 tons per day, whereas the AQMP DEIR reports 1890 tons per day on page 4-1-16. The conclusions in the GMP EIR would not change given this different threshold.

For NO_x, the AQMP reports 242 tons per day, whereas the AQMP DEIR reports 210 tons per day based on the reported 2010 baseline emissions estimate (identified on page 2-4 of the AQMP DEIR) and NO_x emissions reduction estimate (identified on page 2-13 of the AQMP DEIR). The conclusions in the GMP EIR would not change given this different threshold.

For SO_x, the AQMP reports that only Tiers I and II would need to be implemented to attain federal PM₁₀ standards. The estimate of 47 tons per day is therefore based on Tiers I and II. The estimate of 30 tons per day is based on implementation of Tiers I, II, and III.

The GMP EIR uses 603 tons per day of PM₁₀. The estimate of 1361 tons per day relates to total suspended particulates (TSP). The GMP EIR uses PM₁₀ rather than TSP since PM₁₀ more accurately reflects health impacts.

68. See the errata to pages 8-32 and 8-33.

69. Information cited in the "Energy" section has been updated and amended as indicated below in the responses to the SCAQMD's comments.

70. Updated information concerning the use of oil and natural gas in electricity generation is cited in the errata to page 6-58 of the DEIR.

71. Updated information concerning electricity generation resources is cited in the errata to page 6-56 of the DEIR.

72. The role of independent power producers is cited in the errata to page 6-56 of the DEIR.

73. The role of independent power producers is cited in the errata to page 6-58 of the DEIR.

74. Information from the California Energy Commission's (CEC) 1987 Biennial Report (California Energy Commission 1987a) is cited in the errata to pages 6-56 to 6-61 of the DEIR.
75. Updated information concerning out-of-state natural gas supplies and regional natural gas demand is cited in the errata to pages 6-58 of the DEIR.
76. Comment noted. New cars averaged 26 miles per gallon (mpg) in 1986, despite a recent trend toward larger cars, compared to 27 mpg in 1984. The National Highway Transportation and Safety Administration has strengthened Corporate Average Fuel Economy standards from 27.5 mpg to 26.0 mpg, saving an estimated 30 million gallons of gasoline annually in California (California Energy Commission 1987).
77. See Response 47.
78. 1987 energy demand data available from utilities and the CEC correspond to utility service areas rather than the six-county SCAG region. Most recent regional data were provided by SCAG for 1979 and 1980, as shown in the errata to Table 6-11 of the DEIR.
79. Updated information concerning the use and feasibility of nuclear power is cited in the errata to page 6-60 of the DEIR.
80. Updated information concerning the current and projected use of alternative and renewable electricity sources is cited in the errata to page 6-58 of the DEIR.
81. See errata to page 6-60 of the DEIR.
82. Because of system constraints, generating plants should not be expected to operate reliably at 95 percent of capacity.
83. According to SCAQMD staff, the AQMP FEIR indicates that full implementation of Tier I, II, and III measures of the AQMP (including electrification of vehicles) would increase regional electricity demand by approximately 60,500 gigawatt-hours (Gwh) in 2010, representing a 44.2-percent increase in the projected demand shown in the FEIR.
84. Promotion of cogeneration as a mitigation measure would be inconsistent with the AQMP, as indicated in the errata to page 6-61 of the DEIR.
85. Because of conflicting evaluations and incomplete information concerning the relative capital-intensiveness of alternative and renewal energy sources to conventional energy sources, the prior reference has been deleted as indicated in the errata to page 6-61 of the DEIR.
86. Objectives for reduction of regional electricity and natural gas demand have been amended, as indicated in the errata to page 6-61 of the DEIR. See also Response 49.

87. This section of the DEIR refers to irreversible changes to natural habitat. See also the errata to page 3-6.
88. These comments are related to the RMP and are responded to in the RMP/RMP FEIR.



county of ventura

SOLID WASTE MANAGEMENT DEPARTMENT
Kay Martin
Manager

November 18, 1988

Paul Hatanaka, Principal Planner
SCAG
600 Commonwealth Ave., Suite 1000
Los Angeles, CA 90005

NOV 18 1988

SOLID WASTE MANAGEMENT DEPARTMENT

Subject: SCAG Draft Growth Management Plan and Associated Draft
Environmental Impact Report

The Solid Waste management Department has reviewed the solid and hazardous waste sections of the above referenced documents for completeness and accuracy. The following comments are offered for consideration in finalizing the SCAG Growth Management Plan and the Environmental Impact Report for this document

Draft SCAG Growth Management Plan - Chapter III

Wastewater Treatment - It is assumed the figure of 8% capacity shortfall incorporates information supplied in the most recent revision of the Ventura County General Plan. This document indicates an estimated shortfall of approximately 8 million gallons per day of wastewater treatment plan capacity by the 2010.

Solid Waste - The revised Ventura County General Plan indicates that the Simi Valley Landfill could reach capacity as early as mid-1988. The Bailard Landfill in the western watershed is scheduled for reactivation by January 1989 and is permitted for five years of operation. The Toland Landfill, in the central watershed has capacity well beyond the year 2010. Asserting that Ventura County will run out of landfill capacity by 1989 is erroneous.

89

Draft EIR for the Draft SCAG Growth Management Plan - Chapter 6 (Solid Waste Section)

Setting - This Department questions the accuracy of the following statement found on page 6-24 of the DIER: "Despite rising costs for land, equipment, labor and environmental control systems, landfill disposal is still the cheapest means of handling those wastes". The tipping fees currently being charged by landfills within the SCAG region are not representative of the true social costs of landfilling. Social costs include potential environmental degradation (ground water contamination, air pollution, destruction of biological resources, etc.), declining property values and adverse impacts to public health and safety.

90



Paul Hatanaka
November 18, 1988
Page 2

Additionally, the financial compensation obtained from the sale of recyclables is not representative of the social benefits from recycling. Social benefits include avoided disposal costs, energy savings and pollution reduction resulting from the use of recycled materials (rather than virgin materials) in the manufacture of new products.

Once the social costs and benefits of alternative waste handling methods are considered, one will undoubtedly find that landfilling is not the "cheapest means" of handling wastes. Many of the alternatives mentioned in the DEIR may in fact be competitive or more economic than landfilling. One option not mentioned specifically in this section is the potential for construction of a central waste processing facility that incorporates manual and mechanical separation of recyclables and includes composting of the organic fraction of the wastestream. Some vendors have purported that they can develop this alternative at a cost of less than \$35.00 per ton and reduce total volume by as much as 85%.

90
Cont.

Impacts and Mitigation Measures - The 1984 CWMB data for assessment of remaining landfill capacity for counties in the SCAG region appears outdated. Please refer to the 1988 Ventura County General Plan Update, Public Facilities and Services Appendix for current information regarding landfill capacities in our area.

While the countywide annual per capita waste generation rate reported for 1984 in Ventura County (1.22 tons per person per year) is relatively accurate, this figure has since escalated to 1.67 tons per person per year (based on 1987 calendar year). Incorporation of a constant per capita waste generation rate into solid waste disposal demand projections will greatly distort information, especially if other areas in the SCAG region are experiencing similar increases in per capita waste generation rates.

91

The "mitigation measures" presented in this DEIR are representative of a [management] strategy that supports continued reliance on landfills for managing solid waste. Given the increased emphasis on proactive waste management, we are concerned that there is not one specific mitigation measure presented in the DEIR designed to promote waste reduction, reuse and/or recycling.

92

Finally, this Department would like to add that the proposed mitigation measures, namely, to develop a comprehensive regional solid waste management plan and to identify site expansions and new facilities in individual solid waste management plans, are not mitigation per CEQA. Preparation of a regional plan will not ensure implementation of recommendations, nor will it ensure that recommendations contained in that plan will be effective in achieving its goals. Identification of site expansions or new facilities in revised CoSWMPs also will not ensure development of those projects.

93

Paul Hatanaka
November 18, 1988
Page 3

Chapter 6 (Hazardous Waste Section)

The recommended mitigation measures should include a statement that each member county of the Southern California Hazardous Waste Management Authority should adopt and implement County Hazardous Management Plans and establish waste reduction programs.

94

Kay Martin

Kay Martin, Manager

KM/CM/vm

RESPONSES TO THE COMMENTS OF COUNTY OF VENTURA
SOLID WASTE MANAGEMENT DEPARTMENT

89. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
90. The statement on page 6-24 of the DEIR refers only to the direct economic costs of solid waste disposal. These costs do not reflect the indirect environmental, social, and economic costs of landfilling (e.g., from groundwater contamination, air pollution, destruction of biological resources, effects on property values, and public health or safety hazards). Regional water, air quality, biological, and hazardous waste issues are addressed in the DEIR.
- Similarly, the assessment of the feasibility of recycling and other solid waste disposal alternatives on page 6-25 of the DEIR refers to direct economic and environmental constraints for such alternatives. Indirect benefits of recycling could include reduced energy demand and air pollution from manufacturing and deferral of landfilling costs. Construction of central waste processing facilities that separate recyclables and include composting could prove to be cost-effective as compared to landfilling.
91. The use of 1984 as the base year to analyze solid waste impacts is generally consistent with the methodology employed to analyze environmental impacts in the DEIR. Based on information provided by Ventura County staff, and as indicated in the errata to pages 6-25 and 6-28 of the DEIR, the 1988 Ventura County per capita waste generation rate is higher; based on this higher rate, remaining useful life of Ventura County landfill capacity would be lower than indicated in Table 6-6.
92. The mitigation statement has been amended in response to this comment, as indicated in the errata to page 6-28 of the DEIR.
93. The mitigation measures on page 6-28 of the DEIR are not limited to preparation of regional and county solid waste management plans. These measures, which are consistent with CEQA guidelines, specify that counties in the region should meet projected solid waste disposal demand by expanding existing landfill sites and developing new sites as recommended by the California Waste Management Board. See the errata to page 6-28.
94. The mitigation statement has been amended in response to this comment, as indicated in the errata to page 6-33 of the DEIR.

duplicate

STATE OF CALIFORNIA—OFFICE OF THE GOVERNOR

GEORGE DEUKMEJIAN, Governor

OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET

SACRAMENTO, CA 95814



November 18, 1988

Paul Hatanaka
Southern California Association of Governments
600 South Commonwealth Ave., #1000
Los Angeles, CA 90005

Subject: 1988 Regional Growth Management Plan
SCH# 88062924

Dear

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code requires that:

"a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

Commenting agencies are also required by this section to support their comments with specific documentation.

94a

These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact Keith Lee at 916/445-0613 if you have any questions regarding the environmental review process.

Sincerely,

David C. Nunenkamp
Chief
Office of Permit Assistance

Enclosures

cc: Resources Agency

RESPONSES TO THE COMMENTS OF THE CALIFORNIA
OFFICE OF PLANNING AND RESEARCH

- 94a. This letter transmits comments received from state agencies. No additional response is necessary.



SOUTHERN CALIF. ASSOCIATION
OF GOVERNMENTS

NOV 17 1988

DEVELOPMENT SERVICES DEPARTMENT

303 WEST COMMONWEALTH AVENUE • FULLERTON, CALIFORNIA 92632

Telephone: (714) 738-6540

November 22, 1988

Mr. Mark Pisano
Executive Director
Southern California Association of Governments
600 South Commonwealth Avenue, Suite 1000
Los Angeles, CA 90005

Re: Request for a copy of comments on Growth Management and Regional Mobility
Plans/EIRs

Dear Mr. Pisano:

The City of Fullerton respectfully requests a copy of all comments received to date pertaining to the Draft Growth Management and Regional Mobility Plans and their associated Environmental Impact Report. 94b

Thank you for your consideration of this request. If you have any questions, please contact Associate Planner Joel Rosen at (714) 738-6554.

Sincerely,

F. Paul Dudley, Director
Development Services Department

ep

RESPONSES TO THE COMMENTS OF THE CITY OF FULLERTON
DEVELOPMENT SERVICES DEPARTMENT

- 94b. A copy of all comments was transmitted to the City of Fullerton on November 28, 1988.



OFFICE OF:

Planning Department

(714) 736-2262

815 WEST SIXTH STREET (P.O. BOX 940), CORONA, CALIFORNIA 91718-0090

December 30, 1988

Mr. Mark Pisano, Executive Director
Southern California Association of Governments
600 South Commonwealth Avenue, Suite 1000
Los Angeles, California 90005

ATTENTION: SCAG EXECUTIVE COMMITTEE

Dear Mr. Pisano:

Thank you for the opportunity to comment on the draft Air Quality, Growth Management and Mobility Plans which SCAG has prepared for the region. The City of Corona takes a somewhat different view of the future, especially in Riverside County, than SCAG reflects in the plans and environmental documents which you have sent us. We want to take this opportunity to make the SCAG Executive Committee aware of our thoughts on these issues in hopes that you will reconsider your approach.

In regards to the Growth Management Plan, we agree that a balance of jobs and housing on the local level would benefit air quality, mobility, and most importantly, quality of life. The City of Corona has consistently worked to achieve just such a balance through our land use planning and community development efforts. The City does not agree, however, with SCAG'S proposal to "redirect" jobs and housing within the region based on artificially developed "job/housing balance targets". Nor do we agree with SCAG determined and locally administered incentives and penalties for various types of growth. Still less do we agree with yearly monitoring by SCAG of local progress towards these artificial targets.

In using this approach, SCAG seems to be ignoring some basic realities of growth in the region. As clearly expressed in the Draft Growth Management Plan itself on page A6-27, the first of these is that jobs follow housing. We have clear examples of this principle in Orange County and the San Fernando Valley which presently have a reasonable job housing balance, but did not always. It took awhile for jobs to "catch up" with housing. This is what is underway now in the Inland Empire area and elsewhere in the region. Just because areas of the region are not now in balance does not mean that they are not moving in that direction.

94c

The Draft Environmental Impact Report for Growth Management shows that the "no project" alternative for Riverside County also leads to substantial improvement in the jobs/housing balance. Second, as jobs catch up with housing, and regional economic activity decentralizes, regional traffic congestion could decrease provided roadways keep up with local traffic increases, since destinations will be less centralized and more diverse. Third, to quote from page A6-27, "It follows that planners and politicians should allow this favorable spontaneous process to unfold". Problems are more likely to arise when attempts are made to interfere with the process, such as slowing or directing growth. Therefore, our view is that SCAG would do well to remove itself from the growth management issue and not attempt to create yet more regulations for local government, but rather let the economic and development systems and local government do what they do best - respond in their own locally sensitive manner to develop a multitude of jobs and housing balances throughout the region. In this way some of the pressure could be taken off the central core of the region, decentralizing traffic, shortening trips and reducing emissions. In this regard, it would be very appropriate for SCAG to forecast the directions and amounts by which growth is expected to occur, but not to attempt to direct it in any way, since that is local government's job.

94d

We do tend to agree with the concept of "subregional entities" as expressed by SCAG; local "councils of government" designed and created to address issues common to a number of neighboring cities in a county or subregion. However, these should be formed only when and if local governments perceive a need and purpose for them, not because SCAG says they are needed. Also, private members on public agencies, without being elected by any constituencies, are not acceptable from any representative government standpoint.

94e

In regard to the Draft Regional Mobility Plan, the City generally agrees with the objectives of the Plan to facilitate the movement of people and goods throughout the region. Of course, in terms of the four main components, our opinion is that growth management should in effect become "growth monitoring" as described above. Road and highway improvements should, after all, support land use changes and growth rather than growth being constrained by transportation. Demand management, system management and facilities development are, of course essential components of the Plan. However, the Plan does not appear to discuss funding mechanisms or alternatives for local transportation and circulation needs. These are especially critical in developing areas such as ours since we do not yet have sufficient infrastructure needed to serve the jobs and housing growth expected here. Likewise the regional facilities are not sufficient to handle the expected growth. The City would particularly like to see SCAG take a very active role in seeking funding and legislation at the state and national level. In this regard, SCAG should note the one half cent sales tax increase for transportation improvements recently approved by the voters in Riverside County.

94f

At the same time, the City supports the concept of users paying the costs for transportation improvements. Nothing will get people to ride share, use transit, and live closer to work faster than having to pay a substantially larger proportion of the full costs of commuting. Here again, legislative lobbying by SCAG would assist in bringing needed changes more quickly.

Finally, the Regional Mobility Plan calls for increased use of transit, but it is not clear what types of transit are met. It is very important that the Plan recognize that the types of public transit which work in Los Angeles may not be appropriate in the more suburban areas. Densities in Riverside County, for example, simply do not warrant fixed rail systems, and large buses are only marginally viable in many areas. Van routes, dial-a-ride and jitney services may be more appropriate for much of our area at this time, and should be considered for their possible contributions to regional mobility.

94g

In reviewing the Air Quality Management Plan, while the City would like very much for the quality of our air to improve, the number and type of implementation measures to be accomplished by local governments leaves us questioning the feasibility of the 1988 Air Quality Management Plan.

No indication is provided in the plan regarding at which level (City or County) implementation is expected, or how local governments are to pay for the administrative and enforcement costs involved. Specific examples of how a local government can implement the many measures identified should be given. More importantly, only passing mention is given to the political and social realities surrounding the proposed measures. How could a city really regulate alternate work weeks or working at home, trip reductions or shift scheduling at factories? We wonder what growth management by ordinance adoption would really mean in a community. Probably that growth would be directed to communities which did not enact such an ordinance. This could be better, or worse, for air quality purposes, and there is no way to predict that outcome. What would be the land use and economic impacts of basin-wide growth management to reduce air pollution? Economic stagnation and significant unemployment seem likely as well as increased air pollution as businesses moved from growth controlling to non-growth controlling communities, leaving their employees to commute, move, or seek other unemployment.

94h

94i

If these measures are to be successful, all communities must implement them in similar ways over the same time period to prevent the kinds of dislocations and inequities described above. How, with the great variety of communities we have in this air basin, would such a thing happen? Revisions in state laws would be necessary even to enable some of the proposed control measures, not to mention to mandate their implementation.

94j

In conclusion, it appears to us, especially in the Growth Management and Air Quality Management Plans, that SCAG is attempting to expand its technical and advisory role into that of a regulatory agency, on the grounds that local governments cannot do what SCAG considers necessary for the region. But SCAG is not a regulatory agency, and the region's population and lawmakers have not given it such authority. Neither does state law require that local general plans reflect the goals and programs expressed in SCAG'S regional plans. It therefore seems presumptuous for SCAG to write plans, the implementation of which depends on its exercising powers it does not have.

94k

The City supports the general goals of clean air and efficient circulation in the region. The City does not, at this time, question SCAG'S technical expertise or environmental data. But the City does not agree with the three plans as now put forth by SCAG because they do not reflect the social, political and economic realities of the region. They are not workable plans, and making SCAG an unofficial regulatory body for their implementation will not make them workable plans. The plans attempt to burden local government with the enforcement of inappropriate regulations which run counter to the needs of the region's citizens.

94k
Cont.

To be worthwhile, these plans should reflect the diversity and economic vitality which are characteristic of the region and build on these strengths. SCAG needs to take a more creative and positive approach to cleaning our air and moving our traffic, one which is based on working with, rather than against the social, economic and political forces of the region.

Sincerely,

FILE COPY

Mayor Richard Deininger
City of Corona, California

RD/vc
PISANO/

RESPONSES TO THE COMMENTS OF THE CITY OF CORONA
PLANNING DEPARTMENT

- 94c. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
- 94d. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
- 94e. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
- 94f. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
- 94g. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
- 94h. This comment is related to the AQMP and is responded to in the AQMP/AQMP FEIR.
- 94i. This comment is related to the AQMP and is responded to in the AQMP/AQMP FEIR.
- 94j. This comment is related to the AQMP and is responded to in the AQMP/AQMP FEIR.
- 94k. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.

SUMMARY NOTES OF COMMITTEE COMMENTS

ENERGY AND ENVIRONMENT COMMITTEE

OCTOBER 27, 1988

Comments on the Draft Regional Mobility Plan and EIR

1. Consideration should be given to depressing the freeways in order to minimize their environmental impacts.
2. Question encouragement of "scenic highways" and their development as an inducement to more trips and traffic.
3. Questioned the viability of constructing new facilities verses expanding existing older facilities. Perhaps we ought to consider expansion of existing older facilities instead of developing all these new facilities. Development of new facilities tends to work against jobs/housing balance and does not lead us away from use of the automobile. Detroit needs to hear the message that we need to change the image of the automobile from being a status symbol to becoming environmentally nonpolluting.
4. An interest in the ethnic mix and how ethnic composition might impact our plans. Different segments of the population respond differently to different strategies and we shouldn't treat the entire population as though they were homogeneous. What are the impacts of expanding Asian and Hispanic populations? The plan and DEIR should reference SCAG's ethnicity report.
5. Encouraging efforts to change the image and status of transit, making commuter trains more attractive for the general public.
6. Despite our efforts to arrive at a consensus viewpoint on these transportation strategies, the marketplace may have a totally different perspective. How do we steer the marketplace into environmental awareness which would influence the auto manufacturers into designing more environmentally sensitive vehicles?
7. The marketplace maybe waiting for legislation to force the issue, e.g. no cars sold in California that aren't electric or that don't get 50 miles to a gallon.
8. Support greater share of future resources directed toward high occupancy vehicle (HOV) facilities instead of spending too much on transit.

Comments on the Draft Growth Management Plan and EIR

1. Similar to the mobility plan, the growth plan should reference the SCAG ethnicity report and address how changing ethnicity impacts jobs and housing. 96
2. The Air Quality chapter of the GMP EIR uses the 1982 AQMP as criteria for assessing air quality. Since the 1982 plan was officially disapproved by EPA, it should not be considered in the analysis and the focus of the evaluation should be on the 1988 plan. This would insure internal consistency. 97
3. The data used in the Energy chapter of the GMP EIR is obsolete, a more recent 1987 State Energy Commission report should be used in updating this section. 98

RESPONSES TO THE ORAL TESTIMONY RECEIVED AT SCAG'S ENERGY
AND ENVIRONMENT COMMITTEE MEETING ON OCTOBER 27, 1988

95. These comments are related to the RMP and are responded to in the RMP/RMP FEIR.
96. Pages 4-11 through 4-18 of the DEIR describe how changes in ethnicity would affect jobs and housing. This information is partially based on SCAG's report, Southern California: A Region in Transition, published in December 1984.
97. Page 8-3 of the DEIR acknowledges that the 1982 AQMP was not approved by the EPA; however, the 1982 AQMP was adopted by the SCAQMD and SCAG. The DEIR also recognizes that the Draft 1988 AQMP has not yet been approved by the locals or EPA. Therefore, the DEIR air quality analysis considers both plans. The evaluation of the Draft 1988 AQMP considers the consistency of this plan with the GMP.
98. See responses to the comments of the SCAQMD.

PUBLIC HEARING

November 3, 1988

NOV 15 1988

SOUTHERN CALIFORNIA ASS'N
OF GOVERNMENTS

1. JOEL ROSEN - CITY OF FULLERTON

Mr. Rosen stated that he was not presenting all comments on the plans, but raise 2 questions. 1) The availability of documents and technical information on the AQMP. He expressed an interest in understanding the J/H balance and the numbers involved, this information was forwarded to him from SCAG staff. The information requested included a letter from SCAG's staff counsel. He questioned what the content of the letter implied which stated that the information included in the plan should not be duplicated. Does this mean the process is closed to other agencies or entities not affiliated with SCAG or is the process open.

99

President Griffin stated the process is opened. This has been explained to Mr. Rosen at other public comment session, and that if he had other concerns this should be discussed with staff. Colin Lennard, SCAG's Legal Counsel stated that the type of letter received by Mr. Rosen is a standard letter sent by any responsible staff counsel for a public agency. The information furnished to Mr. Rosen are work documents and the information contained in the work document are not under the public records act. SCAG in fact chose to release the work documents because the process is indeed opened.

Secondly, Mr. Rosen requested that the Executive Committee request for an extension from AQMD with regards to the AQMP.

100

Thirdly, he raised concerns with reference to achieving the goals of the Plans. He stated that the City of Fullerton agrees with some of the recommendations of the J/H Balance Committee of the Regional Advisory Council. Particularly with regards to managing the type of housing distribution vs. the types of jobs. Feels that this issue should be addressed by the Executive Committee. Issues regarding the input of the numbers with regards to origin and destination information. What does this mean? If calibration takes place, he would like to see the information. The technical staff of the city of Fullerton have to present recommendation to their City Council and he would like to understand just what is going on. Staff will be communicating with Mr. Rosen regarding his specifics.

101

2. MARSHA MEDNICK - LOS ANGELES COUNTY TRANSPORTATION COMMISSION

Ms. Mednick commended SCAG staff for their work and LACTC will continue to work with staff. She stated that comments presented today are preliminary and additional comments would be forwarded after the Commission's November meeting. The LACTC recognizes the significance of the RFP and it must have the support of the local governments, transportations agencies and the public. Written and technical information have been submitted to SCAG staff and they will providing additional detail.

102

Funding was the first issue addressed. Ms. Mednick stated that currently the unconstrained project listed in the draft plan will require funding far beyond current resources. There is a projected \$30 billion capital shortfall and a \$2.6 billion annual operating shortfall. The Commission is continually seeking additional sources of funding, but the ultimate decision to approve this funding is not left up to the Commission. Therefore, LACTC cannot commit to projects that are on the unconstrained lists. Particularly when they may become federal air quality mandated that require total local financing. Second, without increase funding it is highly questionable that there will be sufficient funds to operate and maintain our existing highway systems over the next 20 years. The amount needed to operate and maintain the highway system increases annually, and will utilize all of the monies available before the year 2010. The Commission also believes the Plan should more fully acknowledge the existing shortfalls that we have now for local street and road maintenance. In Los Angeles County alone this is currently the \$111 million dollar shortfall annually. Third, the RMP should recognize that substantial federal funding will be needed to construct the recommended system including the unconstrained portion.

The Plan now depend on the enhancement of additional state and local taxes and fees. This can provide some revenues, realistically it cannot fund the entire program. If it did for LA county projects this would mean increase comparable to tripling the existing sales tax (19%) or adding \$2 per gallon in gas tax. The Commission feels this is unrealistic. Fourth, some measures of the financial strategies of the Plan may not be feasible. It is important that the Plan identify funding strategies as options to be considered during implementation.

First as part of the region's transit services, the Plan calls for an extensive long-distant line hall transit network. This is composed principally of rail-lines such as those that are now being built between Long Beach and Los Angeles, Norwalk and El Segundo, and downtown Los Angeles. The Commission believe that relying on a massive line-hall system as included in the Draft RFP maybe inconsistent with job/housing balance. Line hall systems should be developed instrumentally as the demand wants. Often less expensive, express bus service could meet the initial demand and the service could later be moved to an exclusive ride of way. 2) The draft RFP does not provide evidence that the recommended commuter rail improvement would be feasible or cost effective. Outside of those actions recommended by the LOSSAN intercity rail study, the LACTC does not support specific rail improvements until their cost effectiveness and feasibility have been evaluated. Further, the RFP should comment on the need for cooperation of the privately owned railroads for implementation of the commuter-rail recommendations. 3) The RFP proposes that adoption of a system of regionally significant highways, including arterial state highways and freeways. This system anticipates changes in federal funding categories under the new authorization bill of 1991. However, the proposed system was made available through SCAG only 2 weeks ago. The Commission believes that a system can only be adopted and carefully review by local jurisdiction, Caltrans, and the transportation agencies. This is not possible within the timeframe of the planned adoption. The Commission will continue working with SCAG and others in the near future on the issue of the new reauthorization bill.

Finally the Plan should state that if conflicts occur in planning for the various modes, conflicts would be resolved by the county transportation commissions. This existing decision-making process should be used to set priorities of the project. Any comments or questions should be directed to Marcia Mednick or Jim Simms.

102
Cont.

3. HEATHER IWAMURO - COMMUTER COMPUTER

Ms. Iwamuro stated that Commuter Computer is in support of the direction of the Regional Mobility Plan, but have some concerns.

103

The increase in transit use might be too drastic insight of the fact that the average vehicle *** is subject to increase from 1.12 to only 1.18. Ms. Iwamuro stated that a vision statement might be helpful in describing what the RMP would mean to the average commuter or local communities. Commuter Computer also has technical correction to offer to Plan, and will continue to work with staff on the Plan.

4. BRYAN ALLEN - CITIZEN

Mr. Allen present comments regarding the EIR for the Regional Mobility Plan, particularly on Growth reducing impacts pg. 127 - 131. States that this section is objectively inadequate. It regurgitates the summary of the GMP in relationship to the RMP. EQA guidelines require reason responses at the very least the RMP/EIR implies the implementation of the GMP is invincible and influenced by anything in the RMP -- that is fundamentally erroneous. EQA guidelines require analysis of all accumulative impacts -- that means multi-stage impacts and include the secondary impact and measures that is intended to be mitigative and the EIR must do so in this respect. Several regulatory measures in the RMP are travel inducing despite their opposite intent. And the travel induced will tend to reinforce existing trends in growth for simultaneous dispersing of housing and excess concentration of employment in the region. That is to say the J/H balance is exasperated thereby contravening the objective of the GMP. Modeling for the RMP has failed to show these traveling inducing impacts because it is a single stage model and because it fail to model consequent land-use impacts. SCAG does have a model recently installed which could be used document these impacts. Mr. Allen stated that he contend that the EIR will continue to be inadequate in documenting the growth and travel inducing impacts of the RMP without use of the model.

104

There are fundamentally 3 ways of restraining growth and travel demand. 1) restraint by congestion itself 2) restraint by regulation by rationing 3) restraint by pricing. There is various measures in the growth demand management section of the RMP which attempts to promote restraint by regulation by incentive. The demand management section also calls for pilot program for restraint by pricing. Mr. Allen states in his opinion only restraint by pricing will be effective consistent with political limitation upon people's choices.

Bryan Allen presented copies -- these copies will be distributed to the President and Executive Director of SCAG.

Public Hearing is still open for comments. It was not closed.

RESPONSES TO THE ORAL TESTIMONY RECEIVED AT THE
DEIR PUBLIC HEARING ON NOVEMBER 3, 1988

99. These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.
100. See Response 1.
101. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
102. These comments are related to the RMP and are responded to in the RMP/RMP FEIR.
103. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
104. These comments are related to the RMP and are responded to in the RMP/RMP FEIR.

ORIGINAL

BEFORE THE
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

IN THE MATTER OF THE:)
)
DRAFT GROWTH MANAGEMENT PLAN)
DRAFT REGIONAL MOBILITY PLAN)
-AND-)
DRAFT AIR QUALITY MANAGEMENT PLAN)

TRANSCRIPT OF PROCEEDINGS

DATE AND TIME: FRIDAY, NOVEMBER 18, 1988, 1:10 P.M.

PLACE: 600 SOUTH COMMONWEALTH AVENUE
LOS ANGELES, CALIFORNIA

REPORTER: ERIC GILLIAM, CSR
CERTIFICATE NO. 3338

Harristers'
reporting service

1600 EAST FOURTH STREET, SUITE 220
SANTA ANA, CALIFORNIA 92701
TELEPHONE (714) 953-4447

APPEARANCES

DON GRIFFIN, PRESIDENT, SCAG
BUENA PARK CITY COUNCIL MEMBER

JUDY WRIGHT, CHAIR, SCAG TRANSPORTATION
AND COMMUNICATIONS COMMITTEE
MAYOR, CLAREMONT
HEARING OFFICER

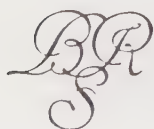
ARCHIE SNOW, CHAIR, SCAG COMMUNITY,
ECONOMIC AND HUMAN DEVELOPMENT COMMITTEE
REDONDO BEACH CITY COUNCIL MEMBER
HEARING OFFICER

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1 LOS ANGELES, CALIFORNIA, FRIDAY, OCTOBER 24, 1988

2 1:10 P.M.

3
4 PRESIDENT GRIFFIN: IF I COULD HAVE YOUR
5 ATTENTION, WE WILL GET THIS HEARING STARTED.

6 WE ARE DELIGHTED TO HAVE YOU HERE, AND I
7 KNOW THE INFORMATION AND DIALOGUE THAT WE RECEIVE TODAY
8 IS MOST IMPORTANT TO US IN DEALING WITH THE STRATEGIC
9 PLANS FOR THIS REGION.

10 I AM DON GRIFFIN, I AM COUNCILMAN IN -- FOR
11 BUENA PARK, ONE OF THE -- BUENA PARK'S ONE OF THE CITIES
12 IN ORANGE COUNTY. AND I AM ALSO THE PRESIDENT OF SCAG.

13 I WOULD LIKE TO INTRODUCE TO YOU THE TWO
14 OFFICIALS WHO WILL ACTUALLY CONDUCT THE HEARINGS.

15 TO MY FAR RIGHT, WE HAVE JUDY WRIGHT. JUDY
16 IS THE MAYOR FROM THE CITY OF CLAREMONT, AND SHE'S ALSO
17 THE CHAIR OF SCAG'S TCC, THE TRANSPORTATION AND
18 COMMUNICATIONS COMMITTEE.

19 TO MY IMMEDIATE RIGHT IS ARCHIE SNOW,
20 COUNCILMAN FROM THE CITY OF REDONDO BEACH, AND HE'S THE
21 CHAIRMAN OF SCAG'S COMMUNITY, ECONOMIC AND HUMAN
22 DEVELOPMENT COMMITTEE.

23 TOGETHER THEY WILL SERVE AS THE HEARING
24 OFFICERS FOR THE PUBLIC HEARING AND RECEIVE COMMENTS. I
25 AM GOING TO BE HERE WITH THEM AS WELL.

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1 AND WE WILL RECEIVE COMMENTS RELATIVE TO
2 SCAG'S REGIONAL GROWTH AND MOBILITY PLANS, AS WELL AS THE
3 DRAFT EIR'S ON THE PLAN.

4 I WOULD LIKE TO JUST GIVE YOU A BRIEF BIT
5 OF INFORMATION, THAT SCAG WANTED TO PROVIDE THIS
6 OPPORTUNITY TO ALL CONCERNED INDIVIDUALS AND AGENCIES,
7 AND THEREFORE HAS SCHEDULED THIS HEARING IN ORDER TO
8 RECEIVE INPUT FROM THE REGION.

9 THROUGH THESE PUBLIC HEARINGS -- ALTHOUGH
10 THESE PUBLIC HEARINGS ARE NOT REQUIRED BY LAW, OR BY THE
11 STATE ENVIRONMENTAL LAW, IN THE INTERESTS OF THE
12 HEARINGS, WE WANTED TO HEAR FROM YOU DIRECTLY, HEAR YOUR
13 CONCERNS AND YOUR THOUGHTS AND IDEAS, AS WE ALL
14 PARTICIPATE IN THIS REGION TOGETHER.

15 AND THIS IS THE SECOND OF THREE PUBLIC
16 HEARINGS WHICH HAVE BEEN SCHEDULED BY SCAG TO HEAR YOUR
17 THOUGHTS REGARDING THE SPECIFIC ISSUES.

18 THE FIRST HEARING THAT WE HAD WAS ON
19 NOVEMBER THE 3RD, AND THE NEXT ONE THAT WE WILL HAVE WILL
20 BE ON DECEMBER THE 15TH. E.

21 SO AT THIS TIME I WOULD LIKE TO TURN THE
22 MEETING OVER TO JUDY WRIGHT.

23 JUDY.

24 HEARING OFFICER WRIGHT: THANK YOU.

25 I'D LIKE TO WELCOME YOU HERE TODAY, AND

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1 ARCHIE AND I WILL BOTH GIVE A LITTLE INTRODUCTION, AND
2 THEN WE WILL GO INTO YOUR REMARKS.

3 THE MAIN PURPOSE OF TODAY'S HEARING IS TO
4 RECEIVE COMMENTS. THERE WILL NOT BE A DISCUSSION OF THE
5 PLANS TODAY, AND WE WILL NOT ANSWER QUESTIONS UNLESS IT'S
6 FOR CLARIFICATION. THEREFORE, WE WOULD LIKE YOU TO
7 MINIMIZE YOUR QUESTIONS, ALTHOUGH THEY CERTAINLY COULD BE
8 CONTAINED IN YOUR TESTIMONY, BUT THEY WILL NOT BE
9 ANSWERED TODAY.

10 IF YOU WOULD PLEASE CONSOLIDATE YOUR
11 REMARKS -- AND I WILL GIVE THE TIME LIMITS IN A LITTLE
12 WHILE -- THIS WILL INSURE THAT EVERYONE IN THE ROOM HAS
13 AN OPPORTUNITY TO PRESENT THEIR TESTIMONY.

14 WE ARE WILLING TO BE HERE AS LONG AS
15 POSSIBLE, ALTHOUGH WE HOPE NO LONGER THAN 5:00, BUT THE
16 HEARING WILL END WHEN EVERYONE HAS HAD A CHANCE TO
17 TESTIFY.

18 THE PRIMARY RESPONSIBILITIES OF ARCHIE SNOW
19 AND MYSELF, THEREFORE, ARE TO RECEIVE ORAL AND WRITTEN
20 TESTIMONY AND JUST TO ASK FOR CLARIFICATION IF WE DON'T
21 UNDERSTAND SOME OF THE THINGS THAT YOU ARE TELLING US.

22 ADDITIONALLY, SOME OF YOU MAY HAVE HEARD
23 THAT THERE IS GOING TO BE A SOCIOECONOMIC IMPACT ANALYSIS
24 DONE ON THE THREE PLANS. AND THAT STUDY WILL BE
25 RELEASED ON DECEMBER 1ST. IT IS NOT AVAILABLE TODAY, AND

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1 IF SOME OF YOU HAVE COMMENTS ON THE SOCIOECONOMIC IMPACTS
2 OF THESE PLANS, YOU MIGHT WISH TO WAIT AND TESTIFY ON THE
3 15TH AFTER YOU HAVE HAD A CHANCE TO READ THAT STUDY.

4 FOR THE RECORD, AND I HAVE A FILE FOLDER
5 HERE, THIS HEARING HAS BEEN ADVERTISED THROUGH LEGAL
6 NOTICE AND ALL OF THE NOTICES ARE CONTAINED HERE, IN
7 MAJOR DAILY NEWSPAPERS IN SIX COUNTIES, THROUGH PRESS
8 RELEASES SENT TO OVER 700 NEWSPAPERS, AND THROUGH NEWS
9 LETTERS AND FLIERS TO OVER 500 AGENCIES AND INDIVIDUALS.

10 I WOULD NOW LIKE TO TELL YOU THE GUIDELINES FOR
11 SPEAKING DURING THE PUBLIC HEARING.

12 ALL OF YOU WHO WISH TO SPEAK SHOULD FILL
13 OUT ONE OF THESE YELLOW CARDS -- THEY ARE LOCATED OVER ON
14 THE TABLE -- AND WE ARE KEEPING THEM IN ORDER, SO WE WILL
15 CALL ON YOU IN THE ORDER THAT YOU FILLED THEM OUT.

16 IT GIVES YOU A PLACE TO PUT YOUR NAME,
17 AFFILIATION, ADDRESS AND TELEPHONE NUMBER, SO THAT IF YOU
18 WISH YOU CAN RECEIVE COMMENTS FROM SCAG ON THESE
19 HEARINGS.

20 TEN MINUTES WILL BE ALLOTTED TO EACH PERSON
21 REPRESENTING AN ORGANIZATION OR GROUP, FIVE MINUTES WILL
22 BE ALLOTTED TO INDIVIDUALS REPRESENTING THEMSELVES.

23 QUESTIONS FROM THE AUDIENCE TO THE SPEAKERS
24 PRESENTING TESTIMONY WILL NOT BE PERMITTED. YOU SHOULD
25 BE ADDRESSING THE HEARING OFFICERS.

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1 SUBMISSION OF WRITTEN TESTIMONY IS
2 ENCOURAGED. YOU CAN SUBMIT A LOT LONGER TESTIMONY TO US
3 IN WRITING AND SUMMARIZE THE TESTIMONY IN THE FIVE OR TEN
4 MINUTES. THEY SHOULD BE DISTRIBUTED TO THE HEARING
5 OFFICERS, STAFF RECORDER, AND THEN TO THE AUDIENCE IF
6 ENOUGH COPIES ARE AVAILABLE. THE WRITTEN STATEMENTS WILL
7 BE SUBMITTED INTO THE RECORD.

8 ELECTED OFFICIALS WILL BE INVITED TO SPEAK
9 FIRST, THEN SPOKESPERSONS FOR AGENCIES AND ORGANIZATIONS,
10 AND THEN INDIVIDUALS IN THE ORDER OF THEIR SIGN UP.

11 WHEN YOU COME UP TO THE PODIUM HERE, IF YOU
12 WOULD GIVE YOUR NAME AND ADDRESS AND ANY AFFILIATION THAT
13 YOU HAVE WITH AN ORGANIZATION OR AGENCY, OR IF YOU ARE
14 SPEAKING FOR YOURSELF, THAT WOULD HELP US TO KEEP TRACK
15 OF THE RECORD TODAY.

16 ORAL TESTIMONY FOR THIS PUBLIC HEARING WILL
17 BE TAPE RECORDED, AS WELL AS TRANSCRIBED BY A COURT
18 REPORTER. PERSONS INTERESTED IN HEARING THE TAPE
19 RECORDING SHOULD MAKE THEIR REQUEST TO SCAG STAFF,
20 DELAINE WINKLER -- I DON'T KNOW WHETHER DELAINE IS
21 HERE -- SHE JUST RAISED HER HAND -- AND YOU CAN CALL THE
22 SCAG NUMBER TO MAKE THAT REQUEST, WHICH IS 385-1000.

23 I WILL NOW TURN THE TIME OVER TO ARCHIE
24 SNOW.

25 HEARING OFFICER SNOW: THANK YOU.

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1 WE HAVE SOME PLAN DOCUMENTS FOR YOUR
2 PERUSAL.

3 THE SOUTHERN CALIFORNIA ASSOCIATION OF
4 GOVERNMENTS, A REGIONAL PLANNING AGENCY THAT REPRESENTS
5 SIX COUNTIES AND MORE THAN A HUNDRED FIFTY CITIES, WILL
6 SOON ADOPT MAJOR PLANS TO GUIDE THE REGION'S FUTURE.
7 THESE PLANS AIM AT CLEANING THE AIR WE BREATHE,
8 MINIMIZING TRAFFIC CONGESTION AND MANAGING THE VAST
9 GROWTH EXPECTED IN SOUTHERN CALIFORNIA.

10 THESE PLANS ARE ALL INTERRELATED. WE
11 CANNOT IMPROVE OUR AIR UNLESS WE DO SOMETHING ABOUT
12 TRAFFIC, SINCE MOST OF OUR AIR POLLUTION COMES FROM
13 AUTOMOBILES AND TRUCKS. BUT WE CANNOT SOLVE OUR TRAFFIC
14 PROBLEMS WITHOUT BRINGING OUR JOBS AND OUR HOUSING CLOSER
15 TOGETHER, SINCE MUCH OF THE TRAFFIC PROBLEM COMES FROM
16 PEOPLE DRIVING A LONG DISTANCE TO GET TO WORK AND HOME
17 AGAIN.

18 THE PLANS HAVE IMPORTANT EFFECTS ON EACH
19 OTHER AND ALSO ON SOCIETY AS A WHOLE, ON THE WAY WE LIVE,
20 WHERE WE LIVE AND OUR JOBS.

21 THE REGIONAL GROWTH MANAGEMENT PLAN, GMP,
22 AS WE REFER TO IT, REPRESENTS A POPULATION, HOUSING AND
23 JOB FORECAST FOR THE YEAR 2010. A KEY CHOICE INVOLVES
24 DISTRIBUTING THE GROWTH SO THAT JOBS AND HOUSING ARE
25 NEARER EACH OTHER.

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1 THE PLAN ASSUMES THAT UNCOORDINATED LOCAL
2 GROWTH MANAGEMENT AND CONTROL EFFORTS WOULD CAUSE AN
3 UNPRODUCTIVE REDISTRIBUTION OF REGIONAL TOTALS.

4 THE GMP DISTRIBUTION OF NEW GROWTH IS
5 DESIGNED TO ACHIEVE BETTER JOB-HOUSING BALANCE IN THE
6 REGION IN ORDER TO IMPROVE MOBILITY AND AIR QUALITY.
7 ONLY A SMALL PERCENTAGE OF NEW HOUSING, 4.2 PERCENT, AND
8 NEW JOBS, 9.5 PERCENT, WOULD BE IMPACTED.

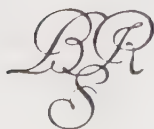
9 THE REGIONAL MOBILITY PLAN AIMS AT
10 RESTORING THE LEVEL OF MOBILITY TO WHAT WE HAD BACK IN
11 1984.

12 WHILE THE COST TO BUILD NEW FACILITIES IS
13 \$56 BILLION, THE PLAN EMPHASIZES DEMAND MANAGEMENT
14 MEASURES SUCH AS RIDESHARING, BETTER USE OF TRANSIT,
15 ALTERNATIVE WORK HOURS AND REDUCED VEHICLE TRANSIT AND
16 VEHICLE MILES TRAVELED. THE MIX OF MEASURES WE USE TO
17 REACH OUR MOBILITY GOALS WILL AFFECT OUR AIR QUALITY
18 FUTURE.

19 FOUR SEPARATE STRATEGIES THAT COULD SOLVE
20 THE PROBLEM WERE CAREFULLY EXAMINED BY SCAG'S EXECUTIVE
21 COMMITTEE OF LOCALLY ELECTED OFFICIALS.

22 THE FIRST WAS A MAJOR PROGRAM FOR BUILDING
23 NEW TRANSPORTATION FACILITIES; THE SECOND SHOWED A HEAVY
24 EMPHASIS ON DEMAND MANAGEMENT; THE THIRD WAS BUILT AROUND
25 AN INTENSE PROGRAM OF SYSTEM MANAGEMENT; THE FOURTH

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1 EMPHASIZED A BALANCE OF JOBS AND HOUSING WITHIN
2 SUBREGIONS TO SHORTEN COMMUTES.

3 THE EXECUTIVE COMMITTEE CONCLUDED THAT THE
4 BEST APPROACH WOULD COMBINE ALL OF THESE COMPONENTS. THE
5 DEGREE TO WHICH EACH OF THESE ELEMENTS IS SUCCESSFUL WILL
6 BOTH DEPEND ON AND DETERMINE WHAT IS REQUIRED FROM THE
7 OTHERS.

8 AN OVERALL PLAN IS ESSENTIAL. ONLY BY
9 FOLLOWING A COMPREHENSIVE STRATEGY, ONE THAT SHARES THE
10 COSTS AND BENEFITS OF THE SOLUTION EQUITABLY, CAN A
11 REGION RETAIN OR IMPROVE ITS MOBILITY.

12 THAT CONCLUDES OUR INTRODUCTION, AND NOW
13 IT'S TIME TO HEAR FROM YOU.

14 AND JUDY WRIGHT HERE IS THE CHIEF HEARING
15 OFFICER, SO IF YOU WILL ADDRESS YOUR QUESTIONS TO HER,
16 WHY, WE WILL APPRECIATE IT.

17 HEARING OFFICER WRIGHT: THANK YOU.

18 I DON'T HAVE ANY CARDS -- YELLOW CARDS FROM
19 ELECTED OFFICIALS AS YET. ARE THERE ANY ELECTED
20 OFFICIALS IN THE ROOM?

21 SEEING NO ONE, THEN WE WILL GO ON TO THE
22 ORGANIZATIONS.

23 IF SOMEONE HAS COME IN SINCE WE GAVE
24 THE RULES OF THE HEARING, YOU SHOULD FILL OUT ONE OF
25 THESE YELLOW CARDS IF YOU WISH TO SPEAK, AND THEY ARE



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1 AVAILABLE ON THE TABLE OVER THERE.

2 WE WILL TAKE ORGANIZATIONS FIRST AND THEN
3 INDIVIDUALS. ORGANIZATIONS HAVE TEN MINUTES. I DON'T
4 HAVE A STOPWATCH, BUT WE ARE GOING TO KEEP PRETTY CLOSE
5 TIME.

6 AND THE FIRST PERSON WHOSE CARD I HAVE IS
7 BILL GAYLC FROM ORANGE COUNTY.

8 MR. GAYLC: WELL, I HAVE A STOPWATCH, BUT I
9 DON'T NEED TEN MINUTES.

10 LET'S SEE, I GUESS I -- THIS IS ACTUALLY A
11 FORMAL LETTER TO --

12 HEARING OFFICER WRIGHT: COULD YOU GIVE YOUR
13 NAME, ADDRESS AND WHERE YOU ARE FROM.

14 MR. GAYLC: YES. OKAY.

15 I AM BILL GAYLC, I WORK WITH THE COUNTY OF
16 ORANGE, AND I AM -- THE OFFICIAL TITLE IS COUNTY
17 DEMOGRAPHER.

18 I WANTED TO ADDRESS THE GROWTH MANAGEMENT
19 PLAN, AND I DO HAVE A WRITTEN DOCUMENT WHICH I GUESS I
20 COULD GIVE TO --

21 HEARING OFFICER WRIGHT: NOT ENOUGH FOR ALL OF
22 US, BUT ENOUGH TO GIVE TO THE SECRETARY.

23 MR. GAYLC: NO, I DON'T. I'M SORRY.

24 HEARING OFFICER WRIGHT: THAT'S FINE. THANK
25 YOU.

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1 MR. GAYLC: IT'S SOMEWHAT THICK.

2 I JUST WANT TO GO OVER ESSENTIALLY THE
3 LETTER THAT WE PREPARED AND ADDRESS A COUPLE POINTS.

4 THE FIRST POINT IS THAT WE WANT TO RESUBMIT
5 AGAIN SUPERVISOR WEIDER'S LETTER THAT SHE PROVIDED TO DON
6 GRIFFIN REGARDING -- IS THIS GETTING FEEDBACK?

7 WE WANT TO RESUBMIT THAT LETTER AS WELL AS
8 THE BOARD MINUTE ORDER WHICH TRANSMITS WHAT ARE CALLED
9 ORANGE COUNTY PROJECTIONS, 1998, AS THE COUNTY'S OFFICIAL
10 INPUT INTO THE SCAG PROCESS.

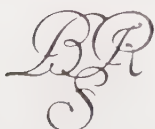
11 SO WE WOULD LIKE TO SEE THAT THOSE NUMBERS
12 ARE INCORPORATED IN THE GROWTH MANAGEMENT PLAN AS THE
13 COUNTY'S -- AS THE COUNTY'S PORTION OF THE GROWTH
14 MANAGEMENT PLAN.

15 TWO OTHER BROADER POINTS WE WOULD LIKE
16 TO -- JUST TO HAVE ON PUBLIC RECORD TODAY IS THAT, FIRST
17 OF ALL, THE COUNTY SUPPORTS THE USE OF THE GMA LOW, WHICH
18 IS CONSISTENT WITH A -- THE COUNTY'S CONSISTENT SUPPORT
19 OF THE USE OF THE STATE DEPARTMENT OF FINANCE PROJECTIONS
20 IN THE PLAN.

21 JUST A COUPLE OF THE REASONS WHY WE DO SO
22 IS THAT FIRST WE FEEL IT WILL INSURE CONSISTENT PLANNING,
23 NOT ONLY THROUGHOUT THE REGION, BUT ALSO THROUGHOUT THE
24 STATE, BECAUSE I THINK A LOT OF WHAT WE ARE TALKING ABOUT
25 OR WHAT WE HAVE BEEN TALKING ABOUT FOR THIS WHOLE

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1 PLANNING PROCESS, IT'S NOT ONLY LOCAL GOVERNMENTS, IT'S
2 NOT ONLY THE REGION, BUT ALSO IT ENTAILS A LOT OF STATE
3 INVOLVEMENT.

4 AND I THINK A CASE IN POINT COULD BE
5 CALTRANS, WHICH IS THAT USING THE STATE DEPARTMENT OF
6 FINANCE NUMBERS, AND HERE THEY ARE INVOLVED IN
7 TRANSPORTATION PLANNING, AND YOU HAVE A SERIES OF
8 TRANSPORTATION PLANNING ACTIVITIES WHICH COULD BE
9 INCONSISTENT.

10 WE ALSO FEEL THAT THE STATE DEPARTMENT OF
11 FINANCE TRACK RECORD HAS BEEN REASONABLY -- IT'S BEEN
12 REASONABLY GOOD, BASED ON RESULTS FROM THE '80 CENSUS; OF
13 COURSE, WE WILL HAVE TO WAIT FOR THE '90 CENSUS TO SEE
14 HOW THINGS GO INTO THE FUTURE.

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Cont.

15 BUT ALSO WE WOULD STRONGLY SUPPORT AND WE
16 WOULD LIKE -- WE WERE -- THERE IS A PROCESS IN THE STATE
17 FOR INSURING THAT THERE IS STANDARDIZATION OF THE
18 PROJECTIONS OF -- YOU KNOW, THROUGHOUT THE STATE
19 INVOLVING THE COUNTIES AS WELL AS THE COUNCIL OF
20 GOVERNMENTS.

21 WE FELT THAT THAT PROCESS SHOULD HAVE
22 BEEN -- THERE SHOULD HAVE BEEN PARTICIPATION IN THE
23 PROCESS BY SCAG TO INSURE THAT THERE IS CONSISTENCY
24 BETWEEN THE STATE AND SCAG NUMBERS, WHICH WE FEEL THAT
25 THERE WASN'T THAT LEVEL OF PARTICIPATION.

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1 WE ALSO HAVE CONCERN WITH THE ADOPTION
2 SEQUENCE, IN THAT THE AIR QUALITY MANAGEMENT PLAN
3 ALREADY, AS WELL AS THE REGIONAL HOUSING ALLOCATION
4 MODEL, DOES HAVE THE -- ARE IN EFFECT PLANS THAT ARE --
5 HAVE -- WELL, THE REGIONAL HOUSING ALLOCATION MODEL HAS 106
6 ALREADY BEEN -- REGIONAL HOUSING NEEDS ASSESSMENT HAS IN
7 EFFECT BEEN ADOPTED, WHICH THEN IN ESSENCE REALLY
8 PREDETERMINES THE DECISION, RATHER THAN ACTUALLY HAVING
9 WHAT WE FEEL IS A REAL MEANINGFUL DEBATE.

10 THE LAST AREA THAT OUR COMMENTS APPLY TO IS
11 IN THE JOB-HOUSING BALANCE.

12 ACCORDING TO THE PREFERRED -- OR THE
13 PREFERRED ALTERNATIVE FROM THE STANDPOINT OF SCAG, WHICH
14 IS GMA FOUR, IS THAT ORANGE COUNTY IS DEPICTED AS A JOB-
15 RICH AND HOUSING-POOR AREA; HOWEVER, WHEN YOU ACTUALLY
16 LOOK AT EMPLOYMENT STATISTICS AND YOU LOOK AT THE NUMBER
17 OF WORKERS IN COMPARISON TO THE NUMBER OF JOBS, THAT
18 ACTUALLY THERE ARE MORE WORKERS IN ORANGE COUNTY THAN
19 THERE ARE JOBS. AND I THINK THAT'S -- THAT THAT'S 107
20 EVIDENT BY THE NUMBER OF PEOPLE JUST THAT COMMUTE OUT OF
21 ORANGE COUNTY INTO L.A. COUNTY, FOR EXAMPLE.

22 PART OF THE PROBLEM, WE FEEL, IS THAT THE
23 METHODOLOGY THAT'S BEEN USED TO DETERMINE JOB-HOUSING
24 BALANCE IS INSENSITIVE TO THE -- TO DIFFERENTIALS IN
25 LABOR FORCE PARTICIPATION.

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1 THE COUNTY HAS -- IN JUST LOOKING AT THE
2 REGION AS A WHOLE, WE ACTUALLY HAVE -- JUST LOOKING AT
3 THE AVERAGE NUMBER OF WORKERS PER HOUSEHOLD, WE ACTUALLY
4 HAVE MORE THAN ONE IN A -- ONE AND A HALF WORKERS PER
5 HOUSEHOLD, WHERE IN THE REGION AS A WHOLE IT'S ABOUT ONE
6 AND A THIRD WORKERS PER HOUSEHOLD. SO FOR EACH -- FOR
7 EACH HOUSING UNIT THERE ARE MORE WORKERS.

8 AND BY APPLYING THE JOB-HOUSING BALANCE AS
9 IT IS NOW APPLIED, WE WOULD ACTUALLY WORSEN A PROBLEM OF
10 PEOPLE COMMUTING OUT OF THE COUNTY BECAUSE WE ACTUALLY
11 NEED MORE JOBS, AND -- INSTEAD OF TAKING -- OR REDUCING
12 FUTURE JOBS AND ADDING A FEW MORE HOUSES WOULD ACTUALLY
13 WORSEN THE PROBLEM.

14 SO THEN THE FINAL -- UNDER JOB-HOUSING
15 BALANCE IS THAT WE -- WHERE WE HAVE A CONCERN IS THAT A
16 POLICY THAT ENCOURAGES THE MOVEMENT OUT OF -- OR THE
17 MOVEMENT OF JOBS OUT OF THE COUNTY MAY IN FACT BE IN
18 CONFLICT WITH THE COUNTY'S BALANCED COMMUNITY POLICY.
19 ESSENTIALLY THAT POLICY REQUIRES SEVERAL -- SEVERAL
20 PLANNED COMMUNITIES TO PROVIDE A MINIMUM -- AT LEAST A
21 NUMBER OF JOBS EQUAL TO -- AT LEAST EQUAL TO THE NUMBER
22 OF DWELLING UNITS.

23 SO IF IN FACT WE ARE ENCOURAGING JOBS TO --
24 TO MOVE OUT OF THE COUNTY, IT'S OUR CONCERN THAT IN
25 THESE -- SOME OF THE JOB-POOR AREAS OF THE COUNTY, SUCH

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1 AS SOUTH ORANGE COUNTY, WHERE WE HAVE THESE POLICIES,
2 THAT IN FACT WE WOULD NOT BE MITIGATING A -- YOU KNOW,
3 THAT IMBALANCE THAT WE HAVE IN THE COUNTY.

4 SO IF THERE'S ANY QUESTIONS, I WOULD
5 CERTAINLY BE GLAD TO ANSWER THEM AT THIS POINT.

6 HEARING OFFICER WRIGHT: THANK YOU VERY MUCH.

7 MR. GAYLC: THANK YOU.

8 HEARING OFFICER WRIGHT: THE NEXT PERSON I HAVE
9 A CARD FOR IS MARGO KOSS FROM THE SIERRA CLUB.

10 MS. KOSS: I'M ACTUALLY HERE MORE AS THE VICE
11 CHAIR OF THE REGIONAL ADVISORY COUNCIL.

12 MY NAME IS MARGO KOSS, 4225 VIA ARBOLADO,
13 LOS ANGELES, CALIFORNIA.

14 THE REGIONAL ADVISORY COUNCIL SUPPORTS THE
15 IDEA OF SUBREGIONAL PLANNING GROUPS AS A MEANS OF
16 IMPLEMENTING THE GROWTH MANAGEMENT AND OTHER REGIONAL
17 PLANS IN SOUTHERN CALIFORNIA.

18 THE COUNCIL URGES THAT SCAG SUPPORT THE
19 FORMATION AND OPERATION OF A NUMBER OF SUBREGIONAL
20 INTEGRATED PLANNING GROUPS WITHIN SOUTHERN CALIFORNIA,
21 CONSISTING OF CITY AND COUNTY GOVERNMENTS, SPECIAL
22 DISTRICTS, REDEVELOPMENT AGENCIES AND OTHER STAKE
23 HOLDERS, SUCH AS NEIGHBORHOOD ASSOCIATIONS, BUILDERS
24 GROUPS AND ENVIRONMENTAL GROUPS FROM WITHIN EACH
25 SUBREGION.

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1 THESE GROUPS SHOULD BE FORMED AROUND
2 EXISTING GROUPS WHENEVER POSSIBLE. FOR EXAMPLE,
3 SUBREGIONAL COUNCILS OF GOVERNMENT THAT NOW EXIST.

4 SUBREGIONAL BOUNDARIES SHOULD BE REDEFINED
5 WHERE NECESSARY TO OBTAIN THE BEST POSSIBLE FIT WITH
6 EXISTING ORGANIZATIONAL, SOCIAL AND GEOGRAPHIC PATTERNS.

7 WE SUPPORT SUCH SUBREGIONAL GROUPS BECAUSE
8 LOCAL GOVERNMENTS, ACTING SEPARATELY, CANNOT ADEQUATELY
9 SOLVE PROBLEMS THAT CROSS LOCAL BOUNDARIES, BUT THE
10 ENTIRE SOUTHERN CALIFORNIA REGION IS TOO LARGE TO PERMIT
11 FOR THE REGION AS A WHOLE THE KIND OF FACE-TO-FACE
12 INCLUSIVE, INTENSIVE AND COLLABORATIVE PLANNING AND
13 PROBLEM SOLVING THAT IS NEEDED.

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Cont.

14 SUBREGIONAL GROUPS, IN ADDITION TO WORKING
15 ON PROBLEMS IN THEIR SUBREGIONS, SHOULD ALSO PARTICIPATE
16 IN REGIONWIDE PLANNING PROGRAMS, INCLUDING SCAG'S, SO AS
17 TO INTEGRATE SUBREGIONAL GOALS AND PLANS INTO A COHERENT,
18 WORKABLE, REGIONAL COMPREHENSIVE PLAN.

19 FUNDING FOR THE SUBREGIONAL PLANNING
20 PROCESS SHOULD COME FROM FEDERAL, STATE AND LOCAL
21 AGENCIES THAT HAVE RESPONSIBILITY CURRENTLY FOR
22 IMPLEMENTATION OF THE MAJOR REGIONAL PLANS: AIR QUALITY,
23 HOUSING, AND COMMUNITY DEVELOPMENT AND TRANSPORTATION
24 AGENCIES.

25 EXISTING REGIONAL ORGANIZATIONS, SUCH AS

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1 SCAG, SHOULD BE FUNDED TO PROVIDE SUPPORT FOR SUBREGIONAL
2 PLANNING IN THOSE SUBREGIONS WHERE SUCH SUPPORT IS
3 DESIRED AND NEEDED.

4 SUPPORT COULD TAKE THE FORM OF PROVIDING
5 MODELS FOR A SUBREGIONAL PLANNING PROCESS, FACILITATING
6 INITIAL FORMATION OF GROUPS, PROVIDING SUBREGIONAL DATA
7 FROM REGIONAL DATA BASES AND PROVIDING TECHNICAL SERVICES
8 IN DATA COLLECTION AND ANALYSIS.

9 THANK YOU.

10 HEARING OFFICER WRIGHT: THANK YOU. AND FOR
11 KEEPING IT SO SHORT, TOO.

12 THE NEXT PERSON TO SPEAK IS KEN BAUER, WHO
13 IS PRESIDENT OF THE FOXMOOR HOMEOWNERS ASSOCIATION IN
14 THOUSAND OAKS.

15 MR. BAUER: I DID BRING COPIES, IF THAT WOULD
16 HELP.

17 MY NAME IS KEN BAUER, AND I LIVE AT 1658
18 MARGATE PLACE IN THOUSAND OAKS.

19 AT THE PRESENT TIME I AM THE PRESIDENT OF
20 THE FOXMOOR HOMEOWNERS ASSOCIATION OF 252 HOMES, A BOARD
21 MEMBER OF THE WESTLAKE VILLAGE JOINT BOARD AND
22 ASSOCIATION OF 39 VARIOUS HOMEOWNERS ASSOCIATIONS IN OUR
23 AREA, AND A MEMBER OF THE THOUSAND OAKS GENERAL PLAN
24 REVIEW COMMITTEE, CIRCULATION AND OPEN SPACE COMMITTEE,
25 AND A CITIZENS ADVISORY COMMITTEE FOR REDEVELOPMENT AREA

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Cont.

1 IN THE AREA OF THOUSAND OAKS.

2 MY CONCERNS FOCUS ON OUR FINITE SUPPLY OF
3 NATURAL RESOURCES, OF WATER, AIR, UTILIZATION OF LAND,
4 EDUCATIONAL NEEDS, AND THE ALLEVIATION OF OUR INTOLERABLE
5 ROADWAY TRAFFIC AND CONJESTION.

6 I AGREE WITH MANY OF THE CONCLUSIONS
7 OUTLINED IN YOUR OVERVIEW DOCUMENT.

8 I ESPECIALLY AGREE WITH YOUR CONCLUSION
9 THAT THERE IS A DEFINITE INTERRELATIONSHIP BETWEEN ALL OF
10 THE PROBLEMS AND CHALLENGES FACING ALL OF US IN SOUTHERN
11 CALIFORNIA, AS WELL AS BETWEEN THE VARIOUS REGIONS OF
12 SOUTHERN CALIFORNIA.

13 THE GROWTH PROJECTIONS FOR THE FUTURE, IF
14 EVEN CLOSE TO YOUR PROJECTIONS, WILL HAVE DEVASTATING
15 EFFECTS ON THIS REGION, IF NOT EFFECTIVELY PLANNED FOR
16 AND MANAGED FROM THIS POINT FORWARD.

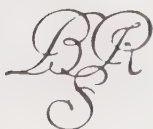
17 IT IS MY OPINION THAT IT IS EXTREMELY
18 IMPORTANT THAT PRIORITY BE PLACED ON LAND USE PLANNING
19 AND DECISION MAKING AS WE PROGRESS TO THE YEAR 2000.

20 THE SCOPE AND NATURE OF THE CUMULATIVE
21 IMPACTS FROM INDIVIDUAL PROJECTS MUST BE GIVEN GREATER
22 CONSIDERATION THAN IN THE PAST. IN FAR TOO MANY
23 INSTANCES THE DECISION-MAKING BODIES SIMPLY LOOKED AT THE
24 SITES' SPECIFIC IMPACTS AND DID NOT PLAN FOR OR MITIGATE
25 THE CUMULATIVE IMPACTS. FUTURE DECISION MAKING MUST BE

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1 INFLUENCED BY THE INTERRELATED ASPECTS OF THE IMPACTS OF
2 LAND-USE DECISIONS.

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Cont.

3 I'D LIKE TO OFFER FIVE IDEAS FOR YOUR
4 CONSIDERATION AND INCLUSION INTO YOUR FINAL DOCUMENT.

5 FIRST: AN EMPHASIS ON EDUCATION LITERACY
6 MUST BECOME A PRIORITY GOAL.

7 TO ACCOMPLISH THIS I WOULD SUGGEST THAT
8 FUTURE TEACHER SALARY ADJUSTMENTS AT A LEVEL ABOVE THE
9 RATE OF INFLATION SHOULD BE TIED TO A RISE IN THE
10 LITERACY LEVEL AND TEST SCORES ON A DISTRICT-BY-DISTRICT
11 BASIS. THE INCREASED COSTS WILL MORE THAN BE OFFSET BY
12 THE ADDITIONAL TAX REVENUE GENERATED BY THE NEW ENTRANTS'
13 WAGE-EARNING CAPACITY AS THEY ENTER THE WORK FORCE, AND
14 THEIR REDUCTION ON DEPENDENCE ON THE SAFETY NET OF SOCIAL
15 SERVICES PROVIDED.

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16 NO. 2: SPECIFIC ATTENTION TO LAND USE
17 PLANNING AND THE DENSITY OF PROJECTS APPROVED IN THE
18 FUTURE MUST BE EMPHASIZED. THE OVER-INTENSIFICATION OF
19 PARCELS IS A PRIMARY CONTRIBUTING FACTOR TO ALL OF THE
20 ADVERSE IMPACTS WE ARE ATTEMPTING TO WORK OUT -- WORK OUR
21 WAY OUT FROM UNDER.

111

22 PLEASE KEEP IN MIND THAT NEITHER THE NOLAN
23 NOR THE FIRST ENGLISH SUPREME COURT RULINGS GUARANTEED A
24 PROPERTY OWNER TOTAL FREEDOM WITH RESPECT TO THE USE OF
25 HIS PROPERTY. THEY SIMPLY STATED THAT ONE COULD NOT BE

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1 DENIED ALL ECONOMIC USE. SUBSEQUENT COURT RULINGS HAVE
2 HELD THAT GOVERNING AGENCIES COULD REDUCE THE ZONING AND
3 RESULTING DENSITY BY AS MUCH AS 90 PERCENT WITHOUT BEING
4 IN VIOLATION OF THE LAW.

5 NO. 3, I WOULD LIKE TO ENCOURAGE THE
6 ADOPTION OF A TAX ON PARKING FACILITIES SERVING THE
7 CENTERS OF EMPLOYMENT. AN EXEMPTION OF 50 PERCENT WOULD
8 BE GRANTED TO VEHICLES WITH TWO RIDERS AND AN EXEMPTION 112
9 OF 100 PERCENT WOULD BE GRANTED TO VEHICLES WITH THREE OR
10 MORE RIDERS, THE REVENUE TO BE USED FOR THE ENCOURAGEMENT
11 AND SUBSIDY OF CAR, VAN POOLS AND BUS USE.

12 AT THE PRESENT TIME THE FEDERAL GOVERNMENT
13 HAS A PROVISION IN THE TAX CODE THAT STATES THAT ANY
14 SUBSIDY GRANTED BY A COMPANY TO EMPLOYEES GREATER THAN
15 \$15 A MONTH SHALL CAUSE THE ENTIRE AMOUNT TO BE INCLUDED
16 AS INCOME TO THAT EMPLOYEE. THIS IS IN REGARDS TO
17 TRANSPORTATION SUBSIDIES.

18 THE COLLECTIVE LOBBYING OF THIS GROUP WITH
19 THEIR CONGRESSIONAL REPRESENTATIVES TO INCREASE THIS
20 LIMIT TO FIFTY OR A HUNDRED DOLLARS A MONTH WOULD ALLOW
21 COMPANIES TO INCREASE THE SUBSIDY AND THE EMPLOYEE NOT TO
22 BE PENALIZED. THE RESULT WOULD BE A MUCH HIGHER
23 UTILIZATION OF CAR, VAN POOLS AND BUSES WITHIN OUR AREA.

24 THE FIFTH AND FINAL AND THE MOST
25 SIGNIFICANT SUGGESTION I WOULD OFFER TO ALL OF YOU WOULD 113

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1 BE TO LINK ALL FUTURE NEW AND HIGHER DENSITY PROJECTS TO
2 THE LEVEL OF SERVICE LEVELS ON OUR MAJOR ARTERIALS
3 LEADING TO OUR FREEWAY NETWORK. REPLACEMENT PROJECTS OF
4 THE SAME OR LOWER DENSITY WOULD BE EXEMPTED AND NOT
5 IMPACTED BY THIS PROPOSAL.

6 THE SUGGESTION IS:

7 BETWEEN NOW AND THE YEAR 1990, ABANDON ALL
8 PROJECTS WHERE THE LEVEL OF SERVICE IS EQUAL TO "F" AND
9 GREATER THAN 100 PERCENT.

10 BETWEEN 1991 AND 2000, ABANDON ALL PROJECTS
11 WHERE THE LEVEL OF SERVICE IS GREATER THAN "F."

12 BETWEEN 2001 AND 2010, A BAN ON ALL
13 PROJECTS WHERE THE LEVEL OF SERVICE IS "E" OR "F."

14 AND THE YEAR 2011 BEYOND, A BAN ON PROJECTS
15 WHERE THE LEVEL OF SERVICE IS "D," "E" OR "F."

16 THIS TYPE OF PHASED APPROACH WILL ADDRESS
17 OUR MOST SERIOUS SITUATIONS FIRST, AND WILL CAUSE THE
18 DEVELOPMENT COMMUNITY TO WORK TOGETHER TO MITIGATE THE
19 IMPACTS OF FUTURE NEW AND HIGHER DENSITY PROJECTS.

20 I WOULD JUST LIKE TO LEAVE YOU WITH A
21 LITTLE STORY, SOME FOOD FOR THOUGHT, MAYBE.

22 I WANT TO THANK YOU FOR THE OPPORTUNITY TO
23 ADDRESS YOU.

24 AND JUST FOR A MINUTE I WOULD LIKE YOU TO
25 PICTURE YOURSELF RIDING ON A TRAIN ANYWHERE IN CALIFORNIA

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1 AT A FAIRLY HIGH RATE OF SPEED.

2 NOW, ONE OF THE MOST CRITICAL COMPONENTS OF
3 A SATISFACTORY OPERATION OF A RAIL SYSTEM IS THE
4 STRENGTH, STABILITY AND WELL BEING OF THE UNDERLYING
5 RAILROAD TIES THAT SUPPORT AND PROVIDE BASIC STRUCTURE
6 FOR THE RAIL SYSTEM TO FUNCTION.

7 NOW PICTURE THIS TRAIN BEING UTILIZED TO A
8 HIGHER AND HIGHER DEGREE BY MORE AND MORE RIDERS WITH NO
9 PROVISION FOR THE MAINTENANCE AND REPLACEMENT OF THE
10 RAILROAD TIES AS THEY DETERIORATE FROM USE OVER THE
11 YEARS.

12 WHAT HAPPENS? WELL, THE SYSTEM WORKS AND
13 WORKS VERY WELL FOR A LONG TIME, UNTIL ONE OR TWO OF THE
14 TIES SIMPLY CANNOT SUPPORT THE LOAD, BURDEN AND STRESS
15 CREATED. THE TRAIN THAT HAS FUNCTIONED SO SUCCESSFULLY
16 FOR SO MANY YEARS BECOMES DERAILED, AND A CALAMITY OF
17 TREMENDOUS MAGNITUDE RESULTS WITH ABSOLUTELY NO WARNING
18 BUT THAT EVERYONE WAS ABLE TOPREDICT. THE RAILROAD TIES
19 OF OUR LIFE JOURNEY ARE OUR AIR, WATER SUPPLY, THE SEWER
20 SYSTEMS AND SOLID LAND FILLS, OUR EDUCATIONAL PROCESS AND
21 LAST BUT NOT LEAST. OUR TRANSPORTATION SYSTEM.

22 WE HAVE AND WILL CONTINUE TO FUNCTION HERE
23 IN THE SOUTHERN CALIFORNIA AREA; HOWEVER, THE UNDERLYING
24 BASE IS BEING UTILIZED AND STRESSED BEYOND ANY CAPACITY
25 EVER ENVISIONED. IF ANY ONE, MUCH LESS MORE THAN ONE,

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1 COMPONENT OF OUR DELICATE ECOSYSTEM FAILS, OUR ENTIRE
2 SOCIETY WILL BE SEVERELY IMPACTED AND RESTRICTED. U.

3 OUR FUTURE AND OUR CHILDREN'S FUTURE ARE IN
4 YOUR HANDS, AND THE DECISIONS THAT ARE MADE AND SUGGESTED
5 BY THIS BODY WILL IMPACT AND MOLD OUR LIFESTYLE FAR INTO
6 THE NEXT CENTURY.

7 THANK YOU.

8 HEARING OFFICER WRIGHT: THANK YOU VERY MUCH.

9 BEFORE WE GO ON TO THE NEXT SPEAKER, I
10 WOULD LIKE TO SAY FOR THOSE OF YOU WHO HAVE COME IN SINCE
11 WE ANNOUNCED LAST, THAT IF YOU WISH TO SPEAK YOU NEED TO
12 FILL OUT ONE OF THE YELLOW CARDS, AND THEN WE WILL PUT
13 YOU IN ORDER HERE.

14 THE YELLOW CARDS ARE LOCATED ON THE TABLE
15 TO YOUR RIGHT.

16 THE NEXT PERSON WHO WOULD LIKE TO SPEAK IS
17 BILL WREN FROM THE ONTARIO CHAMBER OF COMMERCE.

18 MR. WREN: GOOD AFTERNOON.

19 I AM BILL WREN WITH THE ONTARIO CHAMBER OF
20 COMMERCE, AND I AM THE VICE CHAIRMAN OF THE GOVERNMENT
21 RELATIONS COUNCIL.

22 I ALSO REPRESENT TODAY THE ECONOMIC -- THE
23 INLAND EMPIRE ECONOMIC COUNCIL, WHICH IS A CONSORTIUM OF
24 BUSINESSES IN RIVERSIDE COUNTY, AS WELL AS THE SAN
25 BERNARDINO COUNTY.

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1 FIRST I WOULD LIKE TO THANK YOU FOR
2 ALLOWING US TO ADDRESS YOU THIS AFTERNOON.

3 THE TASK OF CREATING PLANS TO PROVIDE A
4 BLUEPRINT FOR FUTURE GROWTH IN SUCH A DIVERSE AND MASSIVE
5 REGION OF OURS IS A MONUMENTAL ONE. WE RECOGNIZE THAT
6 AND WE WANT TO SUPPORT AND PARTICIPATE WITH YOU IN THIS
7 PLANNING EFFORT EXAMINING THE REGION AS A WHOLE, WITH THE
8 OBJECTIVE THAT THE PLAN WOULD BENEFIT ALL THE COUNTIES.

9 WE AGREE WITH SCAG'S PLANS WHICH CALL FOR A
10 JOB-HOUSING BALANCE TO HELP ALLEVIATE MUCH OF THE TRAFFIC
11 AND AIR POLLUTION PROBLEMS WHICH DESTROY OUR QUALITY OF
12 LIFE HERE, AND WE FULLY ENDORSE AN EMPHASIS ON THE
13 CREATION OF JOBS IN LABOR-INTENSIVE AREAS.

14 WHILE WE AGREE WITH THE OVERALL PREMISE OF
15 WHAT SCAG IS ATTEMPTING TO DO, WE FIND THAT MANY TIMES
16 THE PROPOSED PLANS DO NOT AN ADEQUATELY COVER ITS GOALS.

17 IN ADDITION, WE BELIEVE THE PLANS FAIL TO
18 CONSIDER WHAT THE IMPACT WILL BE ON OUTERLYING AREAS AND
19 REGIONS LIKE SAN BERNARDINO AND RIVERSIDE COUNTIES.

20 I DO HAVE WRITTEN COMMENTS, AND I WILL
21 DISTRIBUTE THEM AFTER THIS TALK. BUT I WOULD LIKE TO
22 TOUCH ON A FEW OF THE GENERAL CONCERNS THAT WE DID HAVE.

23 I WILL BEGIN WITH THE GROWTH MANAGEMENT
24 PLAN. THERE ARE THREE BASIC ISSUES WE FOUND.

25 THE FIRST IS THERE SEEMS TO BE AN

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1 ASSUMPTION THAT THE GROWTH NUMBERS OR PROJECTIONS THAT
2 ARE DONE WILL BE NOT BE AFFECTED BY THE AIR QUALITY
3 MANAGEMENT PLAN. WE BELIEVE THAT THIS IS A BIG
4 ASSUMPTION, AND IT IS NOT A VALID ONE.

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Cont.

5 THE AIR QUALITY PLAN CALLS FOR SPECIFIC
6 RESTRICTIONS ON SOME GROWTH. WHAT WILL THE AFFECT BE ON
7 JOBS WHEN THE AIR QUALITY PLAN IS ADOPTED?

8 SECONDLY, THE GROWTH MANAGEMENT PLAN NEVER
9 GIVES YOU A SENSE OF URBAN FORM, THE URBAN FORM IT'S
10 TRYING TO CREATE. IF YOU READ THE ENTIRE PLAN YOU END UP
11 WONDERING WHAT SCAG IS TRYING TO ACCOMPLISH. A FEW
12 PARAGRAPHS AND SOME MAPS OUTLINING WHAT THE REGION IS
13 SUPPOSED TO LOOK LIKE WILL HELP THE PUBLIC UNDERSTAND
14 WHAT URBAN FORM IN THE FUTURE IS BEING PROPOSED.

116

15 LASTLY, THE PLAN ASSUMES IT CAN LEGISLATE
16 CHANGES IN PEOPLE'S BEHAVIOR BY CREATING INCENTIVES OR
17 PENALTIES. WE TEND TO DISAGREE WITH THE ASSUMPTION.

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18 THE PLAN ASSUMES THAT AFTER THESE
19 INCENTIVES ARE IN PLACE PEOPLE WILL BEHAVE ACCORDINGLY.

20 THE ENVIRONMENTAL IMPACT REPORT FOR THE
21 GROWTH MANAGEMENT PLAN UNDERPLAYS THE IMPACT THESE PLANS
22 WILL HAVE ON OUR LIFESTYLES. THE INDIVIDUAL IMPACT NEEDS
23 TO BE DEFINED MORE CLEARLY FOR ALL TO UNDERSTAND.

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24 BETWEEN BOTH PLANS, THE GROWTH MANAGEMENT
25 AND MOBILITY, THE WAY THE POLICIES ARE ARRANGED ARE NOT

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1 NECESSARILY JOB-HOUSING INDUCING. NOR ARE THEY
2 NECESSARILY FEASIBLE.

3 THE MANAGEMENT PLANS APPENDIX IS NOTHING
4 MORE THAN A WISH LIST EXPLAINING WAYS TO OBTAIN A
5 JOB-HOUSING BALANCE. THERE IS A MENU OF POSSIBLE ACTION.
6 BUT NO ADOPTION LIST -- NO ADOPTIVE LIST SHOWING WHAT
7 NEEDS TO HAPPEN. BASICALLY A SERIES OF MEASURES HAVE
8 BEEN USED; MEASURES, I SHOULD ADD, WHICH ARE BASED ON
9 OLDER TRENDS.

10 YOU HAVE IDENTIFIED THE ADVANTAGES OF EACH
11 MEASURE AND HAVE NOT LOOKED INTO THE IMPACT OF HOW THESE
12 MEASURES WOULD WORK TOGETHER.

13 FOR INSTANCE, THE MOBILITY PLAN SUGGESTS
14 THAT STAGGERED WORK HOURS, TELECOMMUTING AND RIDE SHARING
15 PROGRAMS BE INSTITUTED. IF YOU HAVE 20 PERCENT OF YOUR
16 EMPLOYEES WORKING AT HOME AND 60 PERCENT WORKING ODD
17 HOURS, HOW ARE YOU ABLE TO ACCOMPLISH THE RIDE SHARING
18 QUOTAS MANDATED BY REGULATION 15? PARTICULARLY IN FIRMS
19 AS SMALL AS 25 EMPLOYEES.

20 LET ME FOCUS ON THE JOB-HOUSING BALANCE
21 ISSUE.

22 THE PLAN OUGHT TO EMPHASIZE THE CREATION OF
23 JOBS WHERE WORKERS LIVE, RATHER THAN ARTIFICIALLY
24 INDUCING HOUSING BACK INTO THE EXISTING COMMERCIAL AREAS.
25 THIS IS ESPECIALLY TRUE WITH WEST SAN BERNARDINO COUNTY.

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Cont.

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1 THE PLAN ISN'T SPECIFIC ENOUGH AS TO HOW JOBS WILL BE
2 INDUCED. YOU SHOULD BE DRAWING INDUSTRY OUT THERE TO
3 BALANCE OUR GROWTH.

4 IN LOS ANGELES AND ORANGE COUNTY THE PLAN
5 CALLS FOR ADDING APPROXIMATELY 50 JOBS FOR EVERY 100 NEW
6 RESIDENTS. IN RIVERSIDE AND SAN BERNARDINO COUNTIES, ON
7 THE OTHER HAND, THE PLAN CALLS FOR CREATING ABOUT 33 JOBS
8 FOR EVERY HUNDRED NEW PEOPLE. THE NET RESULT IS THAT WE
9 WILL BE ADDING MORE PEOPLE IN OUTERLYING REGIONS THAT
10 WILL HAVE TO COMMUTE.

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Cont.

11 THE PLAN EMPHASIZES ALSO THE WRONG SIDE, WE
12 FEEL, OF THE JOB-HOUSING EQUATION. RATHER THAN
13 EMPHASIZING THE CREATION OF JOBS IN THE OUTLYING REGIONS
14 WHERE PEOPLE ALREADY LIVE, BECAUSE THE LAND IS LESS
15 EXPENSIVE. THE PLAN ATTEMPTS TO CONSTRAIN HOUSING IN
16 THESE REGIONS. BY TYING -- TRYING TO FORCE HOUSING INTO
17 THE MORE EXPENSIVE LAND IN OUR REGION, IT WILL ONLY
18 INCREASE THE COST OF HOUSING AND FURTHER REDUCE THE
19 SUPPLY OF THOSE HOMES WHICH ARE NEEDED TO SUPPLY HOUSING
20 FOR LOW AND MODERATE INCOME FAMILIES.

21 ANOTHER FAULT WE FOUND IN THE PLAN WAS
22 THE LACK OF CONSISTENCY BETWEEN GROWTH MANAGEMENT,
23 MOBILITY AND THE AIR MANAGEMENT POLICIES.

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24 WE HAVE IDENTIFIED MANY OF THESE
25 INCONSISTENCIES IN MY WRITTEN COMMENTS WHICH I WILL HAND

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1 OUT.

2 FOR EXAMPLE, THOUGH, THE GROWTH MANAGEMENT
3 PLAN CALLS FOR FACILITATING THE MOVEMENT OF BUSINESS, AND
4 MENTIONS THE OFFSET REQUIREMENTS.

5 THE AIR MANAGEMENT PLAN, ON THE OTHER HAND,
6 MAKES IT AWKWARD TO MOVE BUSINESSES FROM ONE AREA TO
7 ANOTHER. SCAG'S PLAN LITERALLY IN THIS CASE DISAGREES
8 WITH THE AQMP. THERE IS NO QUANTIFIABLE RELATIONSHIP
9 BETWEEN THE CREATION OF THE JOB-HOUSING PLAN AND THE
10 MOBILITY PLAN.

11 THE PLANS BEG FOR CONSISTENCY.

12 COMMENTS IN THE MOBILITY PLAN SHOULD
13 DIRECTLY COLLABORATE WITH THE GROWTH MANAGEMENT AND VICE
14 VERSA.

15 AND THEY BEG FOR AN EYE TOWARD THE ENTIRE
16 REGION.

17 FOR INSTANCE, THE MOBILITY PLAN UNDER
18 AVIATION POLICIES, THERE IS NO MENTION OF THE GROUND
19 ACCESS MOVEMENT AT THE ONTARIO INTERNATIONAL AIRPORT USED
20 BY APPROXIMATELY FIVE MILLION PEOPLE PER YEAR. THE PLAN
21 DISCUSSES IMPROVEMENT OPTIONS IN THE LOS ANGELES, BURBANK
22 AND ORANGE COUNTY AIRPORTS, BUT NO PRIORITY IS GIVEN TO
23 ONTARIO.

24 IN CLOSING, SCAG IS DEVELOPING PLANS THAT
25 WILL CHANGE THE LIFESTYLE OF EVERYONE IN CALIFORNIA,

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Cont.

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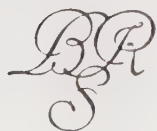
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1 WITHOUT FURTHER ACKNOWLEDGING THE ACCEPTANCE OF THAT
2 CHANGE TO THE INDIVIDUAL. WHETHER OR NOT THAT INDIVIDUAL
3 ACTUALLY WILL ACCEPT THAT CHANGE.

4 IN ADDITION, BOTH THE ENVIRONMENTAL IMPACT
5 REPORTS AND THE PLANS THEMSELVES SERIOUSLY UNDERPLAY THE
6 ECONOMIC IMPACT ON THE AREAS.

7 THE KEY TO IMPLEMENTING A JOB-HOUSING
8 BALANCE IS TO ALLOW THE FREE MARKETPLACE TO DRIVE THE
9 PROGRAM FORWARD. YOU DON'T ALLOW A FREE MARKET SYSTEM TO
10 FOLLOW IF YOU ENFORCE PENALTIES AND CONSTRAINTS. STRONG
11 INCENTIVES, WE FEEL, ARE NEEDED TO BE GIVEN TO DRIVE THE
12 MARKETPLACE TO TAKE ADVANTAGE OF IMPROVED ECONOMICS.
13 ONLY THEN WILL YOU SEE THE PROGRAM TRULY BE IMPLEMENTED.

14 THANK YOU VERY MUCH. I APPRECIATE THE
15 OPPORTUNITY TO TALK TO YOU.

16 HEARING OFFICER WRIGHT: THANK YOU.

17 IF YOU WILL GIVE US A COPY OF YOUR REMARKS
18 OR ONE TO THE SECRETARY. PLEASE.

19 MR. BAUER: YES.

20 HEARING OFFICER WRIGHT: THANK YOU.

21 THE NEXT PERSON WHOSE CARD I HAVE IS FRED
22 FUJIOKA, FROM THE MINORITY COALITION FOR RESPONSIBLE
23 GROWTH.

24 MR. FUJIOKA: THANK YOU.

25 MY NAME IS FRED FUJIOKA. MY ADDRESS IS 911

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1 WILSHIRE BOULEVARD, SUITE 1070, LOS ANGELES.

2 GOOD AFTERNOON.

3 I AM AN ATTORNEY IN PRIVATE PRACTICE AND
4 THE INCOMING PRESIDENT OF THE JAPANESE AMERICAN BAR
5 ASSOCIATION; HOWEVER, TODAY I AM SPEAKING AS A MEMBER OF
6 AND ON BEHALF OF THE MINORITY COALITION FOR RESPONSIBLE
7 GROWTH.

8 FIRST OF ALL, I WOULD LIKE TO EXPRESS MY
9 APPRECIATION FOR THIS OPPORTUNITY TO COMMENT ON THE DRAFT
10 GROWTH MANAGEMENT PLAN IN THE EIR.

11 THE PROJECT PROPOSES A CONCEPT OF
12 JOBS-HOUSING BALANCE AS A TOOL TO BE SHAPED TO REDUCE THE
13 NEGATIVE IMPACTS OF COMMUTING. JOBS-HOUSING BALANCE
14 WOULD REDIRECT GROWTH AS A PRIMARY TOOL. TWELVE PERCENT
15 OF THE FUTURE GROWTH IN EMPLOYMENT WOULD BE DIVERTED TO
16 JOB-RICH AREAS WHERE CONCENTRATIONS OF MINORITY
17 POPULATIONS ARE HIGHEST AND WHERE EMPLOYMENT NEEDS ARE
18 MOST SEVERE -- I AM SORRY, FROM THE JOB-RICH AREAS. THEY
19 WOULD BE DIVERTED TO JOB-POOR AREAS WHERE OUTCOMMUTING IS
20 PROJECTED TO GROW THE MOST.

21 UNDERSTOOD IN ITS SIMPLEST FORM,
22 JOBS-HOUSING BALANCE PROPOSES THAT OPPORTUNITIES MUST BE
23 ENHANCED FOR PEOPLE TO LIVE NEAR THEIR PLACES OF
24 EMPLOYMENT OR VICE VERSA.

25 WE HAVE NO QUARREL WITH THIS PROPOSAL, IN

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1 FACT WE SUPPORT IT; HOWEVER, WE ARE CONCERNED THAT THE
2 TRANSLATION OF THE CONCEPT AND REALITY BE GUIDED BY A
3 PROCESS THAT INDEED SOLVES THE PROBLEM WITHOUT WORSENING
4 OTHERS. THUS THE DESIGN OF THE MECHANISM IS CRITICAL.

5 THE ACTION TO SOLVE THE COMMUTE PROBLEMS
6 COULD HAVE THE UNINTENDED RESULT OF EXACERBATING THE
7 UNEMPLOYMENT PROBLEM IN AREAS WITH PARTICULARLY
8 DIFFICULT-TO-MEET EMPLOYMENT NEEDS.

9 THE MINORITY POPULATION COULD SUFFER FROM
10 DECREASED EMPLOYMENT OPPORTUNITIES, AND THOSE
11 ENTREPRENEURS WHO MIGHT WISH TO CREATE EMPLOYMENT
12 OPPORTUNITIES FOR THE POPULATION MOST IN NEED COULD HAVE
13 THEIR MARKET ADVERSELY AFFECTED BY POORLY DESIGNED JOBS-
14 HOUSING BALANCE PROGRAM.

15 OUR SECOND CONCERN IS THAT THE GROWTH
16 MANAGEMENT PLAN CONTAINS POTENTIAL MASSIVE IMPACTS AND
17 STRINGENT, SOPHISTICATED CUTTING-EDGE MITIGATION ACTIONS.
18 THE STAFF IS TO BE COMMENDED FOR ITS THOROUGH JOB IN THIS
19 REGARD. YET IF WE ACCEPT THAT THESE ANALYSES ARE
20 ACCURATE AND THAT THE MITIGATION ACTIONS ARE REASONABLE
21 AND PRUDENT, THE EFFORT STILL FALLS SHORT.

22 MOST OF THE ACTIONS RECOMMENDED AS
23 MITIGATION MEASURES REQUIRE NO COMMITMENT FROM THOSE WHO
24 HAVE THE MEANS AND AUTHORITY TO MOVE THE ACTIONS FORWARD.
25 OBTAINING THAT COMMITMENT IS THE KEY FULFILLMENT OF THE

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1 GMP, AS WELL AS THE OTHER SCAG PLANS CURRENTLY UNDER
2 REVIEW -- AIR QUALITY, MOBILITY AND HOUSING -- THAT ARE
3 BASED ON ITS FINDINGS.

4 THUS, THE REAL MATTER BEFORE US AS CITIZENS
5 OF THE REGION IS THE MIX OF POLITICAL AND ECONOMIC
6 FORCES, BOTH PUBLIC AND PRIVATE, THAT MUST BE FORGED ANEW
7 IF THE MANAGEMENT OF THE REGION'S GROWTH IS TO BE
8 ACHIEVED.

9 CLEARLY, INDIVIDUALS, JURISDICTIONS AND
10 BUSINESSES ACTING ALONE WILL PROVE INADEQUATE NO MATTER
11 THE DEGREE OR QUALITY OF COMMITMENT TO MITIGATING THE
12 IMPACT OF THE PLAN. WHAT IS REQUIRED IS SOMETHING THAT
13 DOESN'T EXIST NOW.

14 WHILE WE HAVE ALL GROWN ACCUSTOMED TO OUR
15 CURRENT STATE, COUNTY, LOCAL GOVERNMENT DESIGN OF
16 GOVERNANCE, WE MUST NOW BE WILLING TO CONSIDER, IN THE
17 FACE OF THE GROSS REGIONAL IMPACTS OUTLINED, A NEW
18 APPROACH TO COPING WITH OUR PROBLEMS.

19 IN CONCLUSION, THE POLITICAL FORUM IN WHICH
20 FUTURE DECISIONS ARE MADE ON MATTERS AS IMPORTANT AS
21 THOSE DISCUSSED IN THE GMP MUST BE INCLUSIVE OF ALL
22 INTERESTS, INCLUDING THOSE OF ETHNIC MINORITIES, IF IT IS
23 TO BE CREDIBLE AND PRODUCTIVE.

24 THANK YOU VERY MUCH. I HAVE SUBMITTED
25 WRITTEN COPIES OF MY PRESENTATION.

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1 HEARING OFFICER WRIGHT: THANK YOU VERY MUCH.

2 I WILL REPEAT AGAIN, SOME OF YOU ARE
3 GETTING TIRED OF THIS, BUT I WANT TO MAKE SURE EVERYONE
4 KNOWS, IF YOU HAVE COME IN SINCE THE LAST TIME, YOU NEED
5 TO FILL OUT ONE OF THESE CARDS IF YOU WISH TO SPEAK THIS
6 AFTERNOON, AND THE CARDS ARE AVAILABLE ON THE TABLE FOR
7 YOU TO FILL OUT.

8 THE NEXT PERSON TO SPEAK IS AUSTIN SULLIVAN
9 FROM THE CITY OF ONTARIO.

10 MR. SULLIVAN: GOOD AFTERNOON.

11 I AM AUSTIN SULLIVAN, FROM THE CITY OF
12 ONTARIO.

13 I DID NOT EXPECT TO MAKE A VERBAL
14 PRESENTATION THIS AFTERNOON. OUR COMMENTS ARE IN
15 WRITING.

16 BUT IN THE EARLIER COMMENTS I HAVE TWO
17 QUESTIONS WHICH I HOPE CAN BE ANSWERED.

18 ONE HAS TO DO WITH THE PERIOD DURING WHICH
19 PUBLIC COMMENT CAN BE MADE ON THESE DOCUMENTS.

20 I CALLED SCAG STAFF EARLIER IN THE WEEK,
21 AND THEY INDICATED THAT THIS MEETING TODAY WOULD BE THE
22 LAST TIME ANY PUBLIC TESTIMONY COULD BE TAKEN; IS THAT
23 CORRECT? OR IS THE DECEMBER 15TH MEETING -- WILL PUBLIC
24 TESTIMONY BE TAKEN AT THAT TIME?

25 HEARING OFFICER WRIGHT: DECEMBER 15TH IS THE

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1 LAST PUBLIC HEARING, AND IT IS EXPECTED THE PLANS WILL BE
2 ADOPTED BY THE SCAG EXECUTIVE COMMITTEE THAT DAY.

3 THE AIR QUALITY MANAGEMENT PLAN IS EXPECTED
4 TO BE ADOPTED BY THE AIR QUALITY MANAGEMENT DISTRICT
5 BOARD ON THE 16TH.

6 MR. SULLIVAN: I GUESS I HAVE TO ASK,
7 THEN, IF PUBLIC COMMENT IS TO BE TAKEN ON THAT DAY,
8 PRESUMABLY ON THE EIR'S. I WOULD THINK THAT THOSE
9 COMMENTS WOULD NEED TO BE RESPONDED TO IN THE EIR, AND I
10 AM CONFUSED ABOUT THAT. AND I --

11 HEARING OFFICER WRIGHT: I AM SORRY, I DO HAVE
12 ANOTHER BIT OF INFORMATION HERE ON THE EIR: THE LAST DAY
13 FOR WRITTEN COMMENT IS TODAY.

14 MR. SULLIVAN: OKAY.

15 HEARING OFFICER WRIGHT: SO THAT THOSE COMMENTS
16 WILL BE RESPONDED TO BY THE 15TH, I ASSUME.

17 MR. SULLIVAN: OKAY. THAT CLARIFIES THAT.

18 HEARING OFFICER WRIGHT: I AM SORRY. IF THAT
19 ANSWERS YOUR QUESTION.

20 MR. SULLIVAN: THANK YOU VERY MUCH.

21 THE OTHER QUESTION HAS TO DO WITH THE
22 SOCIOECONOMIC STUDY WHICH WAS MENTIONED EARLIER.

23 AND I GUESS I -- I DON'T KNOW WHETHER THAT
24 IS PART OF EITHER OF THE EIR'S. IS IT? OR WAS IT A
25 SEPARATE, FREE-STANDING DOCUMENT?

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1 HEARING OFFICER WRIGHT: I BELIEVE IT WAS A
2 SEPARATE DOCUMENT THAT WAS REQUESTED BY COUNCIL MEMBER
3 FARREL FROM LOS ANGELES, AND IT WILL BE READY ON DECEMBER
4 1ST. AND I AM SURE THAT YOU COULD COMMENT ON THAT ON THE
5 15TH.

6 BUT IT IS NOT PART OF THE EIR.

7 MR. SULLIVAN: THANK YOU VERY MUCH.

8 HEARING OFFICER WRIGHT: THANK YOU.

9 WE WILL THEN GO ON TO THE NEXT PERSON WHO
10 HAS REQUESTED TO SPEAK, JOEL ROSEN, ASSOCIATE PLANNER
11 FROM THE CITY OF FULLERTON.

12 MR. ROSEN: THANK YOU FOR THE OPPORTUNITY TO
13 COMMENT TODAY.

14 MY NAME IS JOEL ROSEN, I AM ASSOCIATE
15 PLANNER OF THE CITY OF FULLERTON, AND I AM HERE TO
16 COMMENT BOTH ON THE GROWTH MANAGEMENT PLAN AND THE
17 REGIONAL MOBILITY PLAN.

18 BEFORE MY COMMENTS BEGIN I WOULD LIKE TO
19 SUBMIT FOR THE RECORD A FORMAL PROPOSAL TO SCAG TO -- AND
20 STRESS TO THE EXECUTIVE DIRECTOR TO INCREASE THE --
21 EXTEND THE TIME OF COMMENT ON THE EIR FOR BOTH THE GROWTH
22 MANAGEMENT AND REGIONAL MOBILITY PLAN.

23 WE ASK FOR 15 MORE DAYS TO CONFORM TO A
24 45-DAY REVIEW PERIOD, WHICH IS NORMAL FOR PLANS OF
25 REGIONAL SIGNIFICANCE, AND ALTHOUGH SCAG DID REQUEST THAT

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1 THERE BE A REDUCTION IN REVIEW PERIOD. PUBLIC COMMENT
2 REVIEW TIME TO 30 DAYS INSTEAD OF THE NORMAL 45 DAYS FROM
3 THE STATE AND IT WAS GRANTED TO THEM. WE FEEL IT'S
4 APPROPRIATE THAT ADDITIONAL TIME BE ADDED, GIVEN THE
5 COMPLEXITY OF THIS NATURE, COMPLEXITY OF THE ISSUES, AND
6 THE UNAVAILABILITY OF CERTAIN DOCUMENTS YET.

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7 AND IN THAT CAPACITY WITH MY SECOND LETTER,
8 WHICH WILL --

9 HEARING OFFICER WRIGHT: I WILL INTERRUPT YOU
10 AND SAY THAT SCAG IS NOT IN DISAGREEMENT WITH YOUR
11 SENTIMENTS. I THINK BOTH THE TRANSPORTATION COMMITTEE
12 AND THE EXECUTIVE COMMITTEE HAVE REQUESTED MORE TIME ON
13 THE PLANS, AND THAT TIME HAS BEEN GRANTED ONCE, I THINK
14 EXTENDED A MONTH. I DON'T THINK IT IT WILL BE GRANTED
15 AGAIN.

16 PRESIDENT GRIFFIN: THE EC COMMITTEE MEETING, I
17 THINK WHICH YOU WERE IN ATTENDANCE, WAS A UNANIMOUS VOTE
18 BY THE EXECUTIVE COMMITTEE TO IN FACT REQUEST AN
19 EXTENSION OF TIME.

20 AT THIS POINT, THE DECISION BY THE AQMD IS
21 ONE THAT HAS GOVERNED, AND THE TIME HAS NOT BEEN EXTENDED
22 BEYOND THEIR DATE OF DECEMBER 16TH.

23 MR. ROSEN: I UNDERSTAND.

24 BUT UNDER "SEE-KWA " GUIDELINES WE ARE
25 STILL ALLOWED TO ASK. INDIVIDUALLY AT LEAST, FOR AN

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1 EXTENSION OF TIME, SO WE ARE DOING THAT TODAY.

2 WE ARE ALSO ASKING FOR THE TECHNICAL
3 APPENDICES TO THE REGIONAL MOBILITY PLAN, WHICH ARE NOT
4 AVAILABLE, AND ALTHOUGH I HAVE CALLED STAFF AND THEY SAID
5 IF I WANT SPECIFIC ONES I CAN GET THEM POSSIBLY, I AM
6 FORMALLY REQUESTING FROM SCAG THAT ALL OF THE TECHNICAL
7 APPENDICES BE MADE AVAILABLE.

8 I HAVE THAT LETTER HERE IN A FORMAL REQUEST
9 TO THAT EFFECT. I WILL SUBMIT THAT FOR THE RECORD.

10 HEARING OFFICER WRIGHT: JUST GIVE IT TO THE
11 PERSON BEHIND YOU THERE.

12 THANK YOU.

13 MR. ROSEN: I WOULD LIKE TO STATE FOR THE RECORD
14 THAT THE CITY OF FULLERTON IS FUNDAMENTALLY OPPOSED TO
15 UTILIZING MANDATORY MEANS TO ARTIFICIALLY SHIFT THE
16 LOCATION OF FUTURE JOBS AND HOUSING IN THE REGION.

17 THE CITY DOES NOT QUESTION THE GOAL OF
18 GETTING WORKERS CLOSER TO THE JOBS. AS A MATTER OF FACT,
19 THE CITY ITSELF HAS A GOAL OF CONCENTRATING HOUSING NEAR
20 EMPLOYMENT CENTERS. 127a

21 FOR EXAMPLE, THE CITY PERMITS AND
22 ENCOURAGES THE MIXED USE OF RESIDENTIAL AND COMMERCIAL
23 DEVELOPMENT IN THE DOWNTOWN REDEVELOPMENT AREA. WE JUST
24 RECENTLY APPROVED A MIXED-USE PROJECT, AS A MATTER OF
25 FACT, OF A HUNDRED AND THIRTY UNITS, RIGHT IN OUR DOWN-

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1 TOWN CORE AREA.

2 HOWEVER. SETTING UP A NEW AND COMPLEX
3 BUREAUCRATIC STRUCTURE WITH PIE-IN-THE-SKY QUOTAS, FEES
4 AND EXACTIONS FLIES IN THE FACE OF COMMON SENSE AND THE
5 MARKETPLACE.

6 THE ABILITY TO ACHIEVE A JOBS-HOUSING
7 BALANCE WHICH WOULD POSITIVELY IMPACT AIR QUALITY AND
8 MOBILITY SHORT OF ILLEGALLY REQUIRING INDUSTRY TO HIRE
9 EMPLOYEES WHO LIVE WITHIN A DEFINED DISTANCE IS EXTREMELY
10 QUESTIONABLE.

11 FULLERTON IS A GOOD EXAMPLE OF THE PROBLEM
12 FACED. FULLERTON IS CONSIDERED A JOB-RICH COMMUNITY. IN
13 1980, ACCORDING TO THE FEDERAL CENSUS, WE HAD A JOBS-
14 HOUSING RATIO OF 1.6, WHICH WAS ABOUT 63,000 JOBS TO
15 APPROXIMATELY 40,000 HOUSING UNITS. YET 63 PERCENT OF
16 THE WORKERS WHO LIVED IN FULLERTON COMMUTED OUT OF THE
17 CITY. AS A MATTER OF FACT, 20 PERCENT OF THE WORKERS WHO
18 LIVE IN THE CITY HAD COMMUTES OF 30 MINUTES OR MORE.

19 WHAT THIS INDICATES IS THAT EVEN IN
20 BALANCED -- QUOTE, UNQUOTE, BALANCED COMMUNITIES, IT MAY
21 BE THE CASE THAT PEOPLE CHOOSE TO LIVE AND WORK IN
22 DIFFERENT PLACES.

23 FOR INDUSTRY, THE DECISION ON WHERE TO SITE
24 A FACILITY MAY BE FOR COMPLEX FINANCIAL REASONS OR IT MAY
25 BE AS SIMPLE AS PROXIMITY TO THE CHIEF EXECUTIVE

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1 OFFICER'S HOME.

2 FORCING EMPLOYERS OUT OF ORANGE COUNTY, FOR
3 EXAMPLE, WILL NOT GUARANTEE THAT THEY RELOCATE IN SAN
4 BERNARDINO OR RIVERSIDE COUNTY.

5 I GUESS IF BUSINESS IS FORCED FROM THE
6 REGION IT'S GOOD FOR AIR QUALITY BUT LOUSY FOR THE
7 ECONOMY.

8 I DID HAVE A DISCUSSION WITH A HIGH LEVEL
9 MEMBER OF THE AIR QUALITY DISTRICT. HE FEELS -- AND I
10 AGREED WITH HIS CONSENSUS -- THAT THIS CONCEPT OF JOBS-
11 HOUSING BALANCE IS IN FACT AN ECONOMIC DEVELOPMENT PLAN
12 FOR THE INLAND EMPIRE. THAT IS THE ISSUE. THAT'S FINE
13 IF THAT IS THE ISSUE. AND WE SHOULD HAVE THAT POSSIBLY
14 AS AN ISSUE. IT SHOULD NOT, HOWEVER, BE DISGUISED AS A
15 GROWTH MANAGEMENT PLAN FOR THE ENTIRE REGION.

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16 I WOULD ALSO LIKE TO COMMENT ON A NUMBER OF
17 THE STRATEGIES THAT ARE SUGGESTED TO ACHIEVE THE GOALS IN
18 THE PLAN.

19 FOR EXAMPLE, THE TELECOMMUTING GOAL OF 20
20 PERCENT TRIP REDUCTION FOR CITY EMPLOYEES IS ABSURD;
21 AFTER YOU TAKE OUT THE FIRE, THE POLICE, THE MAINTENANCE
22 AND OTHER ESSENTIAL PERSONNEL, AT LEAST IN THE CITY OF
23 FULLERTON'S CASE, YOU ARE NOT LEFT WITH ENOUGH ELIGIBLE
24 EMPLOYEES TO ACHIEVE A 20-PERCENT REDUCTION WITHOUT
25 HAVING THOSE EMPLOYEES WHO ARE LEFT OVER COMMUTE OVER 50

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1 PERCENT OF THE TIME. WHICH MEANS YOU BASICALLY DON'T
2 HAVE ANYBODY IN SUPPORT CAPACITY IN YOUR OFFICE.

3 ANOTHER STRATEGY OF REQUIRING LOCAL
4 GOVERNMENT TO CONDITION BUSINESS LICENSE APPROVAL TO
5 SUBMISSION OF RIDE SHARE PLANS IS IN FACT NOT LEGAL.
6 BUSINESS LICENSE APPROVAL IS AN ADMINISTERIAL ACT, AND IS
7 NOT A POLICE POWER.

8 THE GOAL OF APPLYING RIDE SHARING ORDINANCE
9 TO EMPLOYERS OF 25 OR MORE WILL BE EXTREMELY COSTLY, AND
10 IMPOSSIBLE FOR MOST LOCAL JURISDICTIONS TO IMPLEMENT.
11 THEY HAVE NEITHER THE MONEY NOR THE STAFF TO IMPLEMENT
12 THE SUGGESTED PLAN.

13 SCAG NOR THE AIR QUALITY DISTRICT HAVE ANY
14 IDEA OF THE ENORMITY OF THIS TASK. I HAVE TRIED TO FIND
15 OUT HOW MANY EMPLOYERS THERE ARE WITH 25 OR MORE
16 EMPLOYEES OR CENTERS OF 25 OR MORE EMPLOYEES; NO ONE HAS
17 ANY IDEA. AS FAR AS I KNOW.

18 ELIMINATION OF FREE PARKING IN ALL BUT
19 RESIDENTIAL AREAS WILL BE A BUREAUCRATIC NIGHTMARE.
20 CHARGING \$5 PER DAY FOR PARKING, FOR EXAMPLE, IN ORANGE
21 COUNTY, WILL CAUSE UNDUE HARDSHIP ON THE POOR.

22 THESE ARE JUST A SPRINKLING OF SOME OF THE
23 COMMENTS WE HAVE. WE WILL BE SUBMITTING ADDITIONAL
24 COMMENTS AS I AM ABLE TO PRODUCE THEM.

25 IT'S VERY DIFFICULT FOR A CITY OF LOCAL

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1 GOVERNMENT OF OUR SIZE WITH TWO PEOPLE IN THE ADVANCED
2 PLANNING SECTION TO DIGEST THE MAJOR PLANS THAT ARE BEING
3 DUMPED ON US IN THE LAST FEW MONTHS. WE HAVE SOLID WASTE
4 MANAGEMENT PLANS, WE HAVE GROWTH MANAGEMENT PLANS FROM
5 YOUR FOLKS, WE HAVE AIR QUALITY PLANS, WE HAVE EIR'S;
6 IT'S AN EXTREMELY DIFFICULT PROCESS.

7 WE RESPECTFULLY AGAIN REQUEST THAT SOME
8 ADDITIONAL TIME BE GRANTED TO US TO BE ABLE TO UNDERSTAND
9 THESE PLANS AND INTEGRATE THESE PLANS TOGETHER.

10 FOR US ONE OF THE FUNDAMENTAL ISSUES IS HOW
11 DOES THE JOBS-HOUSING BALANCE WORK. WE TRIED TO FIND OUT
12 THE ANSWER TO THAT QUESTION. REQUESTED INFORMATION FROM
13 SCAG; IT TOOK THREAT OF LEGAL ACTION TO GET SOME OF THE
14 INFORMATION FROM SCAG.

15 WE THEN RECEIVED IT FINALLY -- LET'S SEE,
16 WE RECEIVED THIS LAST WEEK. THIS IS THE PLAN RIGHT HERE.
17 THIS IS THE PLAN (INDICATING). THESE ARE THE LITTLE
18 FORMULAS THAT TELL US HOW THE JOBS AND HOUSING ARE GOING
19 TO BE SHIFTED AND WHERE THEY ARE GOING TO GO AND IN WHICH
20 REGIONS THEY ARE GOING TO END UP.

21 TO US IT'S IMPORTANT TO UNDERSTAND THIS
22 DOCUMENT, OR I GUESS YOU WOULD CALL IT THIS PRINT-OUT.
23 BUT IT TAKES MORE THAN A WEEK FOR US TO DO THAT.

24 I THANK YOU AGAIN FOR THE OPPORTUNITY TO
25 COMMENT TODAY, AND I HOPE THAT WE WILL BE ABLE TO PROVIDE

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1 USEFUL COMMENTS TO DEVELOP A PLAN THAT WOULD LEAD TO
2 COOPERATION AMONG THE JURISDICTIONS AND HOPEFULLY SOLVE
3 SOME OF THE PROBLEMS THAT FACE THIS REGION.

4 THANK YOU.

5 HEARING OFFICER WRIGHT: I THINK PRESIDENT
6 GRIFFIN HAS A QUESTION.

7 PRESIDENT GRIFFIN: YES, I WOULD LIKE TO ASK
8 YOU, JOEL, IF YOU WOULD. HAVE YOU MADE A REQUEST TO THE
9 AIR QUALITY DISTRICT REGARDING THE TIME EXTENSION?

10 MR. ROSEN: YES, WE HAVE.

11 PRESIDENT GRIFFIN: OKAY. THAT'S IMPORTANT THAT
12 YOU DO THAT AND CONTINUE TO DO THAT.

13 MR. ROSEN: WE FORMALLY DID THAT, AS DID A
14 NUMBER OF OTHER JURISDICTIONS, AND THEY DENIED IT.

15 PRESIDENT GRIFFIN: ALL RIGHT.

16 SECONDLY, DO YOU HAVE ANY DIRECT EVIDENCE
17 THAT WOULD RELATE TO THE ISSUE THAT YOU RAISED WITH
18 REGARD TO THE INLAND EMPIRE?

19 MR. ROSEN: DIRECT EVIDENCE? I AM NOT SURE WHAT
20 YOU ARE SAYING.

21 PRESIDENT GRIFFIN: WITH REGARD TO -- YOU
22 RELATED TO THE INLAND EMPIRE HAVING A -- SOME KIND OF
23 A -- WELL, I TOOK IT AS A PLAN.

24 MR. ROSEN: NO, I WASN'T -- I WASN'T SAYING IT
25 WAS THE INLAND EMPIRE TRYING TO ACHIEVE THIS NECESSARILY.

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1 WHAT I WAS TRYING TO SAY IS THAT WHAT WE
2 ARE SEEING AND WHY WE SEE TREMENDOUS SUPPORT FROM THE
3 INLAND EMPIRE IS THAT THEY ARE HOPING THAT THIS WILL BE
4 AN ECONOMIC DEVELOPMENT PLAN FOR THEM.

5 I UNDERSTAND THAT, THAT MAKES SENSE. IF I
6 WAS LIVING IN THE INLAND EMPIRE AND INVOLVED IN ECONOMIC
7 ISSUES THERE AND INVOLVED IN THE BUSINESS COMMUNITY I
8 WOULD PROBABLY BE SUPPORTING THE INCREASE IN JOBS IN MY
9 COMMUNITY. THAT MAKES SENSE.

10 BUT IF YOU ARE TYING IT TO QUOTE, UNQUOTE,
11 A GROWTH MANAGEMENT PLAN THAT IS SUPPOSED TO INCREASE
12 MOBILITY AND DECREASED AIR POLLUTION, YOU HAVE SOME
13 FUNDAMENTAL PROBLEMS THERE.

14 IF YOU ARE TRYING TO CREATE THE ECONOMIC
15 DEVELOPMENT OF THE INLAND EMPIRE, THAT'S FINE. IF YOU
16 ARE TRYING TO DECREASE AIR POLLUTION AND INCREASE
17 MOBILITY, YOU HAVE TO ADDRESS THOSE ISSUES DIRECTLY, AND
18 I DON'T FEEL THAT GROWTH MANAGEMENT DOES THAT AS RELATED
19 IN THIS PLAN.

20 HEARING OFFICER WRIGHT: WELL, I THINK THAT WE
21 WOULD APPRECIATE SOME MORE INFORMATION IN WRITING IF YOU
22 HAVE IT ON THE INLAND EMPIRE, BECAUSE I GUESS I DID NOT
23 INTERPRET MR. WREN'S COMMENTS AS SUPPORTIVE. SO I THINK
24 THAT'S VERY INTERESTING.

25 MR. SULLIVAN IS SHAKING HIS HEAD, FROM THE

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1 CITY OF ONTARIO.

2 THANK YOU VERY MUCH.

3 THE NEXT SPEAKER IS AN INDIVIDUAL, AND I
4 GUESS WE HAVE NO MORE GROUPS HERE TODAY WHO WISH TO
5 SPEAK.

6 IT'S DORIS BRADSHAW, WHO LISTS HERSELF AS A
7 CONCERNED CITIZEN.

8 MS. BRADSHAW: GOOD AFTERNOON.

9 MY NAME IS DORIS BRADSHAW, MY ADDRESS IS
10 19044 SANTA RITA STREET, TARZANA, IN THE SAN FERNANDO
11 VALLEY.

12 AND I WAS MAILED A COPY OF THE OVERVIEW. I
13 HAVE NOT SEEN ANY OTHER INFORMATION ON THE PROPOSED
14 PLANS, BUT I ASSUME THAT THERE ARE OTHER OPTIONS IN
15 SOLVING THE AIR QUALITY PROBLEM IN ADDITION TO CHANGING
16 THE HOUSING PATTERNS.

17 AND I WANTED TO BRING YOUR ATTENTION TO
18 THE FACT THAT A PROJECT IS -- FEDERAL PROJECT IS IN
19 PROGRESS THAT IS IN VIOLATION OF THE NATIONAL
20 ENVIRONMENTAL POLICY ACT AS FAR AS -- FOR FAILING TO
21 FORMALLY COORDINATE WITH THE AIR QUALITY MANAGEMENT
22 DISTRICT.

23 AND THE DISTRICT SAYS IT DOES NOT HAVE THE
24 AUTHORITY TO PUT A HALT OR FORCE THE AGENCY TO COMPLY.
25 AND THEREFORE, I AM WONDERING WHY THIS TAKES PLACE IF IT

128

3-168

ERIC GILLIAM, CSR 3338



1600 EAST FOURTH STREET, SUITE 220
SANTA ANA, CALIFORNIA 92701
LOS ANGELES 213-622-8511 ORANGE COUNTY 714-953-4447 SAN DIEGO 619-455-1997

Barristers'
reporting service

1 IS COMMON POLICY THAT AGENCIES, CIVIC AGENCIES, ARE ABLE
2 TO PROCEED IN VIOLATION OF OUR ESTABLISHED AIR QUALITY
3 STANDARDS, AND IF LOGICALLY THAT SHOULD NOT TAKE PLACE
4 WHEN WE ARE IN THE SITUATION WE ARE. AND SO I CAME TO
5 BRING THAT TO YOUR ATTENTION.

123
Cont.

6 AND THEN ALSO IN THE GROWTH MANAGEMENT
7 SECTION OF THE OVERVIEW, I NOTICED A REFERENCE TO
8 PROPOSING PLANS FOR TRANSPORTATION, HOUSING, AIR QUALITY,
9 ET CETERA.

10 WELL, IN THE "ET CETERA," WE HAVE A SEVERE
11 FLOODING PROBLEM, AND I AM SPEAKING OF LOS ANGELES
12 COUNTY.

13 I LIVE UPSTREAM IN THE LA RIVER SECTION,
14 AND I AM VERY MUCH CONCERNED ABOUT THE -- WHAT'S CALLED A
15 CRISIS IN FLOODING BECAUSE OF GROWTH ISSUES.

16 SO I BROUGHT SOME INFORMATION THAT THE ARMY
17 CORPS OF ENGINEERS PROVIDED LAST YEAR AND A LITTLE BIT OF
18 BACK-UP TO THAT SO THAT I COULD ADVERTISE THIS PROBLEM.
19 LOGICALLY IT SHOULD ALSO BE CONSIDERED AN IN-GROWTH
20 ISSUE.

129

21 BECAUSE THE ONE LETTER I INCLUDED INSIDE
22 THE BROCHURE -- YOU CAN READ LATER -- IS FROM THE COUNTY
23 OF -- DEPARTMENT OF PUBLIC WORKS. IT TRACES THE FLOOD
24 CRISIS TO --

25 HEARING OFFICER WRIGHT: IF YOU WOULD ADDRESS

3-169

ERIC GILLIAM, CSR 3338

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SAN DIEGO
619-455-1997



Barristers'
reporting service

1 THE HEARING BOARD, WE'D APPRECIATE IT.

2 MS. BRADSHAW: I AM SORRY. YES. THANK YOU.

3 DIRECT DEVELOPMENT OF WATERSHED. AND WE
4 HAVE OUTGROWN OUR FLOOD SYSTEM IN LA COUNTY.

5 THIS BROCHURE GIVES YOU A MAP SHOWING THAT
6 THE CUMULATIVE EFFECTS OF THE FLOODING, NOW BY THE TIME
7 IT REACHES THE LONG BEACH AREA, IS VERY, VERY SERIOUS.
8 AND IF WE HAVE WHAT'S CALLED A HUNDRED YEAR STORM THIS
9 WINTER IT WILL OVERFLOW THE BANKS AND CAUSE SEVERE
10 FLOODING AND DAMAGE TO LIVES AND PROPERTY AT THAT END.

11 NOW, THE STUDY IN PROGRESS IS CALLED THE
12 LOS ANGELES COUNTY DRAINAGE AREA STUDY, IT'S DUE TO BE
13 FINISHED IN 1990. AND I WOULD HOPE THAT IN YOUR -- THE
14 PLANS THAT YOU ARE PUTTING TOGETHER YOU WOULD COORDINATE
15 WITH THE ARMY CORPS OF ENGINEERS.

16 ONE OF THE PROBLEMS OF THE CUMULATIVE
17 EFFECT OF THE RUNOFF IS THE INSTALLATION OF STORM DRAINS.

18 SO UPSTREAM -- I INCLUDE A PICTURE OF STORM
19 DRAINS READY TO GO IN IN THE FIFTH DISTRICT, WHERE MOST
20 OF THE UNDEVELOPED WATERSHED EXISTS. THAT'S UPSTREAM.

21 AND I HAVE SPOKEN TO CITY OFFICIALS, THEY
22 SAY IT'S A COUNTY PROBLEM; I HAVE TALKED TO THE COUNTY,
23 WITH NO -- NOT MUCH RESPONSE AT ALL.

24 SO I AM THROWING THE BALL TO YOU, AND MAYBE
25 TOGETHER YOU CAN COME UP WITH SOME LOGICAL SOLUTION THAT

129
Cont.

3-170

ERIC GILLIAM, CSR 3338

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619-455-1997



Barristers'
reporting service

1 WILL NOT GIVE US A BANGLADESH-TYPE AFFAIR DOWN IN LONG
2 BEACH.

129
Cont.

3 THANK YOU.

4 HEARING OFFICER WRIGHT: THANK YOU VERY MUCH.

5 THOSE ARE ALL THE CARDS THAT I HAVE, SO I
6 ASSUME THAT NO ONE ELSE IN THE AUDIENCE WISHES TO SPEAK
7 TODAY.

8 AND UNLESS THERE ARE ANY COMMENTS FROM
9 HEARING OFFICERS, I THINK THAT CONCLUDES OUR HEARING.

10 ARE THERE ANY OTHERS IN THE AUDIENCE WHO
11 WISH TO -- WHO CAME TODAY TO SPEAK, TO WATCH WHAT WAS
12 GOING ON FIRST OR SOMETHING?

13 IF NOT, THEN THIS CONCLUDES OUR HEARING.

14 AND YOU HAVE ANOTHER TIME TO APPEAR, AND
15 THAT'S ON DECEMBER 15TH, IN THIS SAME ROOM.

16 THANK YOU VERY MUCH FOR COMING.

17 (THE PROCEEDINGS WERE

18 ADJOURNED AT 2:15 P.M.)
19
20
21
22
23
24
25

3-171

ERIC GILLIAM, CSR 3338

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619-455-1997



Barristers'
reporting service

REPORTER'S CERTIFICATE

I, ERIC GILLIAM, HEREBY CERTIFY THAT ON
THE 18TH DAY OF NOVEMBER, 1988, I DID REPORT
IN SHORTHAND THE TESTIMONY AND PROCEEDINGS OF THE FOREGOING
PROCEEDINGS; THAT AT THE CONCLUSION OF THE ABOVE ENTITLED
MATTER, I DID TRANSCRIBE MY SHORTHAND NOTES INTO TYPEWRITING,
AND THAT THE FOREGOING TRANSCRIPT IS A TRUE AND CORRECT COPY OF
MY SHORTHAND NOTES THEREOF.

Eric Gilliam

CERTIFIED SHORTHAND REPORTER

CERTIFICATE NO. 533P

3-172



1600 EAST FOURTH STREET, SUITE 220
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TELEPHONE (714) 953-4447

Barristers'
reporting service

NOVEMBER 18, 1988

COMMENTS DELIVERED AT THE PUBLIC HEARING ON THE FUTURE OF
SOUTHERN CALIFORNIA TO THE SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS.

My name is Ken Bauer and I reside at 1658 Margate Pl., Thousand Oaks, Ca. At the present time I am the President of our Foxmoor Homeowners Association of 252 homes, A board member of the Westlake Village Joint Board of 39 Homeowner Asociations in our area, a member of the Thousand Oaks General Plan Review Committee, Circulation and Open Space Committees, and on a Citizens Advisory Committee for a redevelopment area in Thousand Oaks.

My concerns focus on our finite supply of natural resources of water, air, utilization of land, educational needs and the alleviation of our intolerable roadway traffic and congestion.

I agree with many of the conclusions outlined in your overview document. I especially agree with your conclusion that there is a definite interrelationship between all of the problems and challenges facing all of us in the Southern California area. The growth projections for the future if even close to your projections will have devastating effects on this region if not effectively planned for and managed from this point forward.

It is my opinion that it is extremely important that a priority be placed on land use planning and decision making as we progress toward the year 2000. The scope and nature of the cumulative impacts from individual projects must be given greater consideration than in the past. In far too many instances the decision making bodies simply looked at the site specific impacts and did not plan for or mitigate the cumulative impacts. Future decision making must be influenced by the interrelated aspects of the impacts of land use decisions.

I would like to offer five ideas for your consideration and inclusion into your final document.

1-An emphasis on education and literacy must become a priority goal. To accomplish this I would suggest that future teacher salary adjustments at a level above the rate of inflation should be tied to a raise in the literacy level and test scores on a district by district basis. The increase cost will more than be offset by the additional

tax revenue generated by the new entrants wage earning capacity as they enter the workforce, and their reduction on dependence on the safety net of social services provided.

2-Specific attention to land use planning and the density of projects approved in the future must be emphasized. The over intensification of parcels is the primary contributing factor to all of the adverse impacts we are attempting to work our way out from under. Please keep in mind that neither the Nolan or the First English Supreme court rulings guaranteed a property owner total freedom with respect to the use of property. They simply stated that one could not be denied all economic use. Subsequent court rulings have held that governing agencies could reduce the zoning and resulting density by as much as 90% without being in violation of the law.

3-I would like to encourage the adoption of a tax on parking facilities serving centers of employment. An exemption of 50% would be granted for vehicles with 2 riders and an exemption of 100% would be granted for vehicles with 3 or more riders. The revenue to be used for the encouragement and subsidy of car and van pools and bus use.

4-At the present time the federal government has a provision in the tax code that states that any subsidy granted by a company to employees greater than \$15/month shall cause the entire amount to be included as income to that employee. The collective lobbying of this group with our congressional representatives to increase this limit to \$50 or \$100/month would allow companies to increase a subsidy and the employee not be penalized. The result would be a higher utilization of car and van pools and busses.

5-The final and most significant suggestion I would offer to all of you, would be to link all future new and higher density projects to the LOS levels on our major arterials leading to our freeway network. Replacement projects of the same or lower density would be exempted/not be impacted by this proposal:

- Between now & 1990, ban on projects where LOS=F and >100%.
- 1991-2000, ban on projects where LOS=F.
- 2001-2010, ban on projects where LOS=E or F.
- 2011 and beyond, ban on projects where LOS=D, E or F.

This type of phased approach will address our most serious situations first and will cause the development community to work

together to mitigate the impacts of future new and higher density projects.

I want to thank you for this opportunity to address you and would like to leave you with this story. Just for a minute, picture yourself riding on any train, anywhere in California at a fairly high rate of speed. One of the most critical components of the satisfactory operation of a rail system is the strength, stability and well being of the underlying railroad ties that support and provide basic structure for the rail system to function. Now picture this train being utilized to a higher and higher degree by more and more riders with no provision for maintenance and replacement of the ties as they deteriorate from use over the years. What Happens???.. Well, the system works and works very well for a long time until one or two of the ties simply can not support the load, burden and stress created. The train that has functioned so successfully for so many years becomes derailed and a calamity of tremendous magnitude results with absolutely no warning, but that everyone predicted.

The railroad ties of our life journey are our air and water supply, the sewer systems and solid land fills, our educational process and last but not least our transportation system. We have and will continue to function here in the Southern California Area. However, the underlying base is being utilized and stressed beyond any capacity ever envisioned. If any one much less more than one component of our delicate eco-system fails, Our entire society will be severely impacted and restricted. Our future and our childrens future are in your hands, the decisions you make will for better or worse mold our life style far into the next century.

Thank-you..



Ken Bauer

1658 Margate Pl Thousand Oaks, Ca 91361
W-213-486-1268 H-805-497-6117

Ontario Chamber of Commerce

Bill Wren's presentation before the Southern California Association of Governments planning directors' committee

Nov. 18, 1988

Los Angeles

Good Afternoon. I'm Bill Wren, vice-chairman of the Ontario Chamber of Commerce Governmental Relations Council. I am also representing today the Inland Empire Economic Council, a consortium of Riverside and San Bernardino county businesses.

I thank you for allowing us the opportunity to address you here today on the SCAG growth management and mobility plans.

The task of creating plans to provide a blueprint for future growth in such a diverse and massive region as ours is a monumental one. We want to support and participate with you in this quality planning effort examining the region as a whole. Our objective is for the plan to benefit every county.

We agree with SCAG's plans which call for a job/housing balance to help allieviate much of the traffic and air pollution problems which destroy our quality of life here and we fully endorse an emphasis on the creation of jobs in labor intensive areas.

While we agree with the overall premise of what SCAG is attempting to do, we find that many times the proposed plans do not adequately cover its goals. In addition, we believe the plans fail to consider what the impact will be to outer lying regions like San Bernardino and Riverside counties.

I do have written comments prepared to give to you today but I will briefly touch on some of our general concerns.

I'll begin with the growth management plan. There are three basic issues we've found. Number one, there seems to be an assumption that the growth numbers or projections that are done will NOT be affected by the air quality management plan. We believe that's a big assumption, and one that isn't valid. The air quality plan calls for specific restrictions on some growth. What will the affect be on jobs when an air quality plan is adopted?

Second, the growth management plan never gives you a sense of the urban form it's trying to create. If you read the entire plan you end up wondering what SCAG is trying to accomplish? A few paragraphs and some maps outlining what the region is supposed to look like will help the public understand what the urban form of the future is proposed to be.

Lastly, the plan assumes it can legislate changes in people's behaviors by creating incentives or penalties. We tend to disagree with that assumption. The plan assumes that after these incentives are in place, people will behave accordingly. The environmental impact report for the growth management plan underplays the impact these plans will have on our lifestyles. The individual impact needs to be defined more clearly for all to understand.

Between both plans -- the growth management and mobility -- the way the policies are arranged are not necessarily job/housing inducing. Nor are they necessarily feasible. The management plan's appendix is nothing more than a "wish list," explaining ways to obtain a job/housing balance. There's a menu of possible action, but no adopted list showing this is what needs to happen.

Basically, a series of measures have been used -- measures I should add, which are based on old trends. You have identified the advantages of each measure and have not looked at the impact of how these measures would work together. For instance, the mobility plan suggests that staggered work hours, telecommuting and ridesharing programs be instituted. If you have 20 percent of your employees working at home, and 60 percent working odd hours, how are you able to accomplish the ridesharing quotas mandated by Regulation 15, particularly in firms as small as 25 employees.

Let me focus on the job/housing balance issue. The plan ought to emphasize the creation of jobs where workers live rather than artificially inducing housing back into existing commercial areas. Especially for Western San Bernardino County, the plan isn't specific enough as to how jobs will be induced. You should be drawing industry out there to balance our growth. In Los Angeles and Orange County, the plan calls for adding 50 jobs for every 100 new residents. In Riverside and San Bernardino counties, on the other hand, the plan calls for creating 33 jobs for every 100 people. The

net result is that we will add more people in the outer lying regions that will have to commute to work.

The plan emphasizes the wrong side of the job/housing equation. Rather than emphasizing the creation of jobs in outerlying regions where people already live because the land is less expensive, the plan attempts to constrain housing in these regions. By trying to force housing unto the more expensive land in our region, it will only increase the cost of housing and further reduce the supply of those homes which provide for low and moderate incomes.

Another fault we found in the plans is the lack of consistency between growth management, mobility and air management policies. We have identified many of these inconsistencies in our written comments. For example, the growth management plan calls for facilitating the movement of businesses and mentions offset requirements. The air management plan, on the other hand, makes it awkward to move certain businesses from one area to another. SCAG's plan literally disagrees with the AQMP.

There is no quanifiable relationship between the creation of a job/housing plan and the mobility plan. The plans beg for consistency. Comments in the mobility plan should directly collaborate with the growth management and vice versa.

And they beg for an eye towards the entire region. For instance, in the mobility plan under aviation policies, there is no mention of ground access improvements for Ontario International Airport, used by five million passengers a year. The plans discuss improvement options for Los Angeles, Burbank and Orange County airports, but no priority is given to Ontario.

In closing, SCAG is developing plans that will change the lifestyle of everyone in Southern California without further acknowledging the acceptance of that change to the individual.

In addition, both the environmental impact reports and the plans themselves seriously underplay the economic impact on the area. The key to implementing a job/housing balance is to allow the market place to drive the program forward. You don't allow a free market system to follow if you enforce penalties or constraints. Strong incentives need to be given to drive the market place to take advantage of improved economics. Only then will you see your program implemented.

FRANCISCO X. GOMEZ
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November 18, 1988

Re: Regional Mobility Plan Draft Environmental
Impact Report

Good Afternoon. My name is Fred Fujioka. I am an attorney in private practice in Los Angeles and I am a member of the Minority Coalition for Responsible Growth. I am in-coming President of the Japanese American Bar Association.

I would like to express my appreciation for this opportunity to comment on the Draft Growth Management Plan (GMP) and EIR.

The project proposes the concept of Jobs/Housing Balance as a tool to be shaped to reduce the negative impacts of commuting. Jobs/Housing Balance would redirect growth as a primary tool. Twelve percent of the future growth in employment would be diverted from job-rich areas; where concentrations of minority populations are highest and where employment needs are most severe, (i.e. unemployment is high), to job poor areas where outcommuting is projected to grow the most.

Understood in its simplest form Jobs/Housing Balance proposes that opportunities must be enhanced for people to live near their places of employment, or, vice-versa. We have no quarrel with this proposal, in fact we support it. However, we are concerned that the translation of the concept into reality be guided by a process that indeed solves the problem without worsening others.

Thus, the design of the mechanism is critical. The action to solve the commute problem could have the unintended result of exacerbating the unemployment problem in areas with particularly difficult to meet employment needs. The minority population could suffer from decreased employment opportunities and those entrepreneurs who might wish to create employment opportunities for the population most in need could have their market adversely affected by a poorly designed Jobs/Housing Balance program.

Our second concern is that the Growth Management Plan contains potential massive impacts and stringent, sophisticated "cutting-edge" mitigation actions. The staff is to be commended for its thorough job in this regard. Yet, if we accept that these analysis are accurate and that the mitigation actions are reasonable and prudent, the effort still falls short.

Most of the actions recommended as mitigation measures require no commitment from those who have the means and authority to move the actions forward. Obtaining that commitment is the key fulfillment of the GMP as well as the other SCAG plans currently under review, Air Quality, Mobility and Housing that are based on its findings.

Thus, the real matter before us as citizens of the region is the mix of political and economic forces, both public and private, that must be forged anew if the management of the region's growth is to be achieved.

Clearly, individuals, jurisdictions, and businesses acting alone will prove inadequate no matter the degree or quality of commitment to mitigating the impacts of the plan. What is required is something that does not now exist.

While we have all grown accustomed to our current state, county, local government design of governance, we must now be willing to consider, in the face of the gross regional impacts outlined, a new approach to coping with our problems.

In conclusion, the political forum in which future decisions are made on matters as important as those discussed in the GMP must be inclusive of all interests, including those of the ethnic minorities if it is to be credible and productive.

Thank you.



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Ontario Chamber of Commerce
Comments on the SCAG Growth Management Plan, the Regional
Mobility Plan and the Mobility Plan's EIR

Submitted November 18, 1988

GROWTH MANAGEMENT PLAN

First off, are the regional job growth projections reasonable overall in light of the AQMP?	130
I-2: a key caveat...type of job with price of housing.	131
I-4, IV-5: Is there consistency with the regional housing needs assessment (RHNA) and the growth management plan (GMP)? How will the revision to the GMP be incorporated into RHNA?	132
II-9: Does the period 1970-84 constitute a valid time upon which to base the Baseline projection? Are the trends valid?	133

Where the future takes flight...

IV-5: There needs to be a clear tie between policies two and three; is policy six inconsistent with jobs/housing balance intent? We question the validity of policy seven.	134
V-1: Question the validity of growth control contingency; and the consistency with the AQMP, especially in the final finding	135
VI-6: Given the trends of the last few years, is it reasonable to assume that emerging futures will result in fewer jobs than the 1970-84 trend?	136
VII-5: Question how reasonable for the West Valley.	137
VIII-2,3: There's no plan in this plan--What measures will be taken/required? Where's the relationship to the appendices?	138
VIII-4,5,6: It's impossible to determine the consistency of individual projects with long-term subregional projections; needs clear incentives for locating jobs in housing-rich regions and clear requirements for comparable affordable housing in job-rich areas.	139
A1-1: How do fees get exchanged between regions and agencies?	140
A1-2: not workable; different agencies within a subregion will have very different ratios (third paragraph)	141
A1-3: enterprise zone concept could be undone by AQMP	142
A1-4: see 4(b) and 4(e)!!!	
A1-6: #11 needs clear tie to cost of housing versus type of jobs	143
A1-7: #13 would not work to achieve jobs/housing balance; inject irrelevant consideration into "home rule" issue	144
A1-7: #15 strongly support!!!	145
A1-7: #16 might contribute to continuation of decline	146
A2-3,4: A(2) -- some cities would simply not fit into regional plan based on type of vacant land	147
A2-4,5: A(3) is not acceptable given political makeup of SCAG	148

A2-7: A(5) -- you cannot just increase and decrease densities without strong housing market considerations

149

A2-12: C(1) -- it's difficult to establish targets on an agency-by-agency basis without a clear understanding of local values and appropriate land uses, and it's difficult to administer.

150

A2-14: five is not acceptable

151

MOBILITY PLAN

IV-4: Policies two and seven aren't consistent with the needs of the poor and elderly. And the final policy -- endorsing a maglev train. Why would rail as an alternative to air travel improve mobility?

IV-6: Both policies need emphasis, especially in relation to previous policy.

V-5,6: Question the consistency of alternate work week and telecommuting with ridesharing

V-8: Video school? home shopping? -- question the social implications

156

V-9: trip reductions plans for multi-tenant buildings -- is it consistent with jobs/housing balance? 25 employees is very small for enforcement of Rule XV

V-12: HOV lanes should not reduce existing number of available lanes; why signal mitigation districts only for Riverside County?

In addition to more buses, additional operating subsidies must be found.

V-28: Given the existing commute problems and funding limits, what is the real priority of an Los Angeles to San Diego or Los Angeles to Santa Barbara rail?

V-34,36: Should specifically study regional transportation benefits of expanding Ontario International Airport

V-36: Why is there no emphasis on Ontario airport's ground access improvement?

V-41: What will the establishment of "truck delivery zones" mean?

V-43: Why move trucks to off-peak in all areas and in all directions?

V-51: Improvement of SR 71 should be a shorter-term priority

REGIONAL MOBILITY PLAN -- ENVIRONMENTAL IMPACT REPORT

How do modified work hours increase productivity? The conclusion at the end of page 121 is not supportable in term of business efficiency!

Page 123: Riverside and San Bernardino counties will experience higher costs.

Page 124: Transit fare structures which favor elderly and handicapped in absence of outside subsidies will discourage transit for home-work commute.

Page 138: West San Bernardino Valley is not identified as gaining employees from job/housing policies -- that's inconsistent with the GMP.

143, 144: Are lower operating costs a valid conclusion when considering higher gas taxes and especially when considering that jobs/housing balance is aimed at new jobs and new housing?

147: There could be a decrease in efficiency of operation due to greater need for management overhead; loss of comraderie and espiert-de-corps; less control of ongoing work efforts

148: Improved communication with the East Coast is only true if workers come earlier; reduced congestion on elevators and plant

156
Cont

gates is superfluous and is indicative of the self-serving nature of the EIR.

149: A significant BENEFICIAL economic impact?? Facilitate movement of goods???

152: J and L understate impacts

(The Ontario Chamber of Commerce was assisted by consultant Lloyd Zola, of the Planning Network, 2940 East "G" St., #105, Ontario, CA, 91764, in preparing the written and verbal comments presented to SCAG)

156
Cont.



COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

1540 ALCAZAR STREET
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Telephone: (213) 226-8111

ADDRESS ALL CORRESPONDENCE TO:
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LOS ANGELES, CALIFORNIA 90051

THOMAS A. TIDEMANSON, Director
WYNN L. SMITH, Chief Deputy Director
CECIL E. BUGH, Assistant Director
JAMES L. EASTON, Assistant Director

1. REPLY PLEASE
REFER TO FILE

19.60

July 7, 1986

Ms. Doris L. Bradshaw
19044 Santa Rita Street
Tarzana, CA 91356

Dear Ms. Bradshaw:

LOS ANGELES RIVER-SEPULVEDA FLOOD CONTROL BASIN

Supervisor Hahn asked me to respond to your letter of May 12, 1986, concerning adequacy of the Sepulveda Flood Control Basin and the Los Angeles River.

The Los Angeles River and Sepulveda Dam were designed and constructed by the U.S. Army Corps of Engineers. The dam is operated by the Corps of Engineers. Maintenance of the Los Angeles River downstream of the dam to approximately Lankershim Boulevard is the responsibility of this Department.

Several years ago, we became concerned, as you are, of the adequacy of the Los Angeles River system to handle a large storm event since the design of this system was based upon population projections made many years ago. Following World War II, the San Fernando Valley experienced explosive growth with much greater development than had been originally anticipated when the system was designed. This development has resulted in greater amounts of storm runoff reaching the Los Angeles River more quickly.

The Corps of Engineers, in response to our concerns, has been studying the entire flood control system in the Los Angeles drainage area. The preliminary results of the study will be available later this year. Current discussions with the Corps of Engineers indicate that the Los Angeles River may not have capacity to carry all runoff from a major storm event. Once the analysis is complete, the most feasible methods of upgrading the Los Angeles River system will have to be identified and a financing plan developed. We expect that we will need to look to the Federal government for funds as reconstruction or modification of the system will be very costly.



South Coast
AIR QUALITY MANAGEMENT DISTRICT

9150 FLAIR DRIVE, EL MONTE, CA 91731 (818) 572-6200

August 1, 1988

Ms. Doris L Bradshaw
19044 Santa Rita St.
Tarzana, CA 91356

Dear Ms. Bradshaw:

Thank you for your letter of July 19, 1988, in which you shared some material on the Sepulveda Basin Recreation Lake project, and requested our comments on the air quality issues. Dr. Lents has asked me to look into the matter. I have reviewed the information you provided and discussed it with my staff. We have the following comments.

The Corps of Engineers was in error, we believe, in not seeking formal coordination with the District. This is especially true because of the non-attainment status of the South Coast Air Basin for federal air quality standards under the provisions of the federal Clean Air Act. The Corps, as a federal agency, must work with local air quality agencies to ensure that federal projects are consistent with the Act. In fact, the Corps did so when it prepared the 1981 EIR/S, excerpts of which you also provided. The District believes that this project could induce adverse air quality impacts, and should have been discussed with us.

Potential air pollutant emissions and air quality impacts should have been re-analyzed and presented to the District for comment. The reliance on the 1981 analysis, which itself relied in part on 1979 air quality data, was not warranted given the changes in air quality, emissions characteristics, and, perhaps, in the scope of the project itself. At the least, a supplemental EIR/S should have been prepared and subjected to the public review process. Air quality impacts could arise from construction activities and vehicle use induced by the new recreation facilities. These impacts are calculable, and the information should be presented. If the emissions exceed the District suggested significance thresholds, then they constitute significant adverse environmental impacts requiring mitigation.



US Army Corps
of Engineers
Los Angeles District

SEPTEMBER 1987

LACDA UPDATE

Los Angeles County Drainage Area
Flood Control Study

DISASTROUS FLOODING COULD RETURN TO LOS ANGELES COUNTY

Residents of the Los Angeles basin have not worried about flooding for almost 50 years. Now, whenever heavy rains fall, residents have abundant cause to worry.

If you live or work near the Los Angeles River in the San Fernando Valley or in downtown Los Angeles, close to Tujunga Wash in the San Fernando Valley, or in the cities of Bellflower, Burbank, Carson, Cerritos, Compton, Downey, Gardena, Glendale, Lakewood, Long Beach, Lynwood, Montebello, Paramount, Pico Rivera, Signal Hill, South Gate, or Torrance, we want you to know that floods from huge storms could damage you.

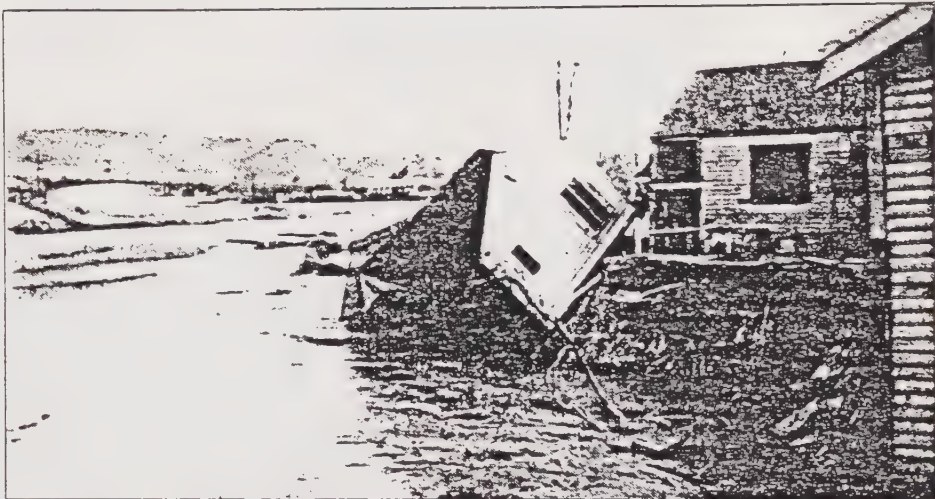
And even more monstrous storms could extend the flooded area into the cities of Artesia, Bell, Cudahy, Hawaiian Gardens, Huntington Park, Industry, Maywood, Norwalk, Santa Fe Springs, Vernon, and Whittier.

Why Has the Flood Threat Returned?

From the 1930's through the 1960's, the Corps of Engineers and the Los Angeles County Department of Public Works built a superb flood control system of dams, channels, and storm drains that—to date—has prevented almost \$4 billion in damages.

But, as anyone who lives in the Los Angeles basin knows, development has almost totally replaced the orange groves and open fields of the recent past. Development has paved over porous soil that once soaked up much of the rainfall. The rainfall must go somewhere. Today, it flows rapidly off buildings, over streets and parking lots, and into our flood control drains and channels.

In addition, storm water runoff pouring down from the mountain canyons carries soil and debris that



Flooding destruction on the Los Angeles River, March 1938

settle in the flood control reservoirs, reducing their capacity to hold flood waters.

The existing flood control system is no longer capable of protecting hundreds of thousands of residents from large floods. Some of them are you! The system needs an upgrade. The Corps of Engineers and the Los Angeles County Department of Public Works are now planning to improve the flood control system that you depend on.

Public Involvement Needed in Finding Acceptable Solutions

A whole range of solutions are possible: modifying existing dams, building new ones, improving river channels, reconstructing river bridges that now restrict the flow of flood water, and adding new flood water diversion channels. You may have other suggestions.

Continued, next page

Continued from page one

Ultimately, the selection of the best improvements to the flood control system in the Los Angeles basin will depend on what (1) technically solves the flooding problems, (2) is most economical for the expenditure of Federal and local government funds, and (3) satisfies public needs, desires, and concerns.

The Los Angeles District of the U.S. Army Corps of Engineers has prepared this bulletin to explain:

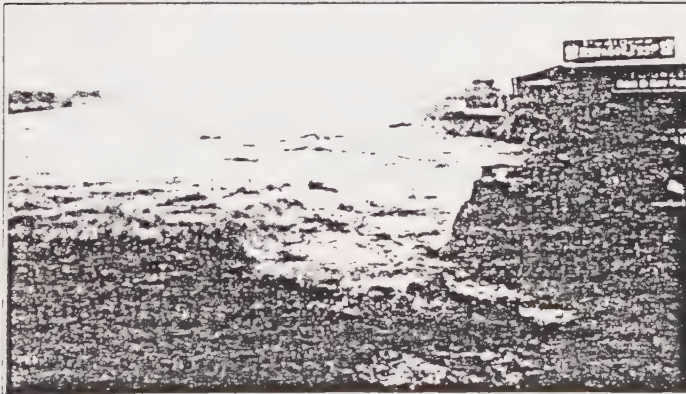
- why flooding is once again a cause for concern among Los Angeles area residents;
- what the Corps of Engineers and the Los Angeles County Department of Public Works are doing to allay the concern; and
- how you can become involved.

You now have an opportunity to tell and discuss with the planners your concerns, ideas, suggestions, and desires through a series of public workshops.

The Corps of Engineers and the Los Angeles County Department of Public Works invite your involvement to work with them to develop a flood control plan that will solve the problem, be economical and affordable, and satisfy your concerns and needs—and those of your neighbors.

YOU CAN MAKE A DIFFERENCE.

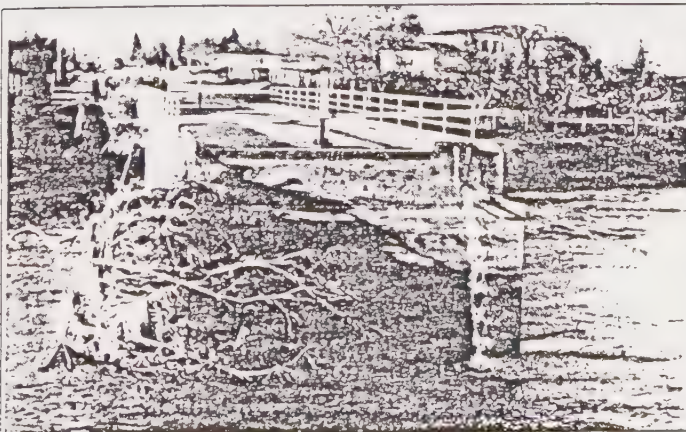
Illustrative Photos of March 1938 Flooding and Parts of Today's Flood Control System Close to Capacity



Torrential flood water on the Los Angeles River, 1938



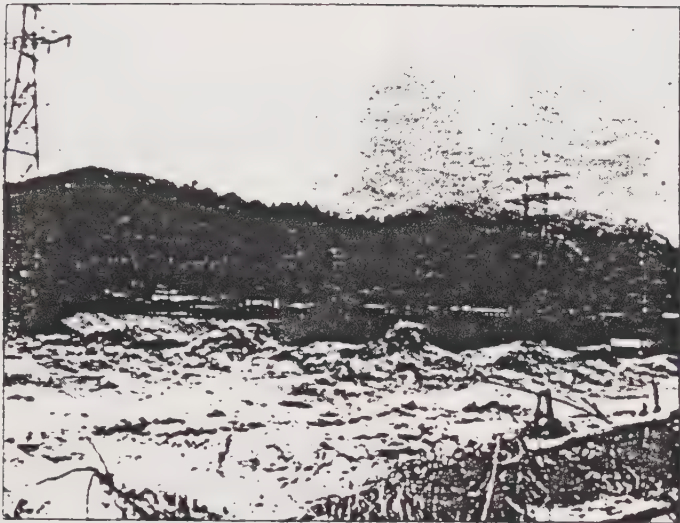
1938 flooding in Compton



Bridge destruction on the Los Angeles River from the flood



Car immobilized by debris and mud from the 1938 flood



Courtesy of Los Angeles Times

The Los Angeles River channel, looking northwest from just below the Los Feliz Bridge during the January 1969 storm



Los Angeles River at Cedros Avenue in the San Fernando Valley during the December 1980 storm

FLOODING IN LOS ANGELES: THE GROWING THREAT

Major areawide flooding has not concerned residents living in the Los Angeles basin for almost 50 years. Yes, rainstorms have caused local damages sometimes in the millions of dollars. But an impressive system of dams, channels, and storm drains has contained flood water in the rivers, passing it efficiently to the Pacific Ocean. By controlling the runoff from the sizable storms of 1969, 1978, 1980, and 1983, the flood control system in the Los Angeles basin has prevented almost \$4 billion in damages.

Cause for concern returned in 1980—at least on the part of flood control engineers. You may recall that six winter storms swept over the Los Angeles basin in rapid succession. The flood control system was doing the job it was designed to do. By the sixth storm, reservoirs had filled, and the channels were passing and containing heavy flows of water, mud, and debris. There was only local flooding in the canyons.

Then, potential trouble arose over the Pacific Ocean: a seventh storm was bearing down on southern California and the flood control system that was close to capacity. The weather forecasters were predicting 2 to 4 inches of new rainfall. Flood control engineers began to question whether their system could handle the additional load. Fortunately, in 1980 at least, the trouble didn't come to pass. The seventh storm never reached the Los Angeles basin.

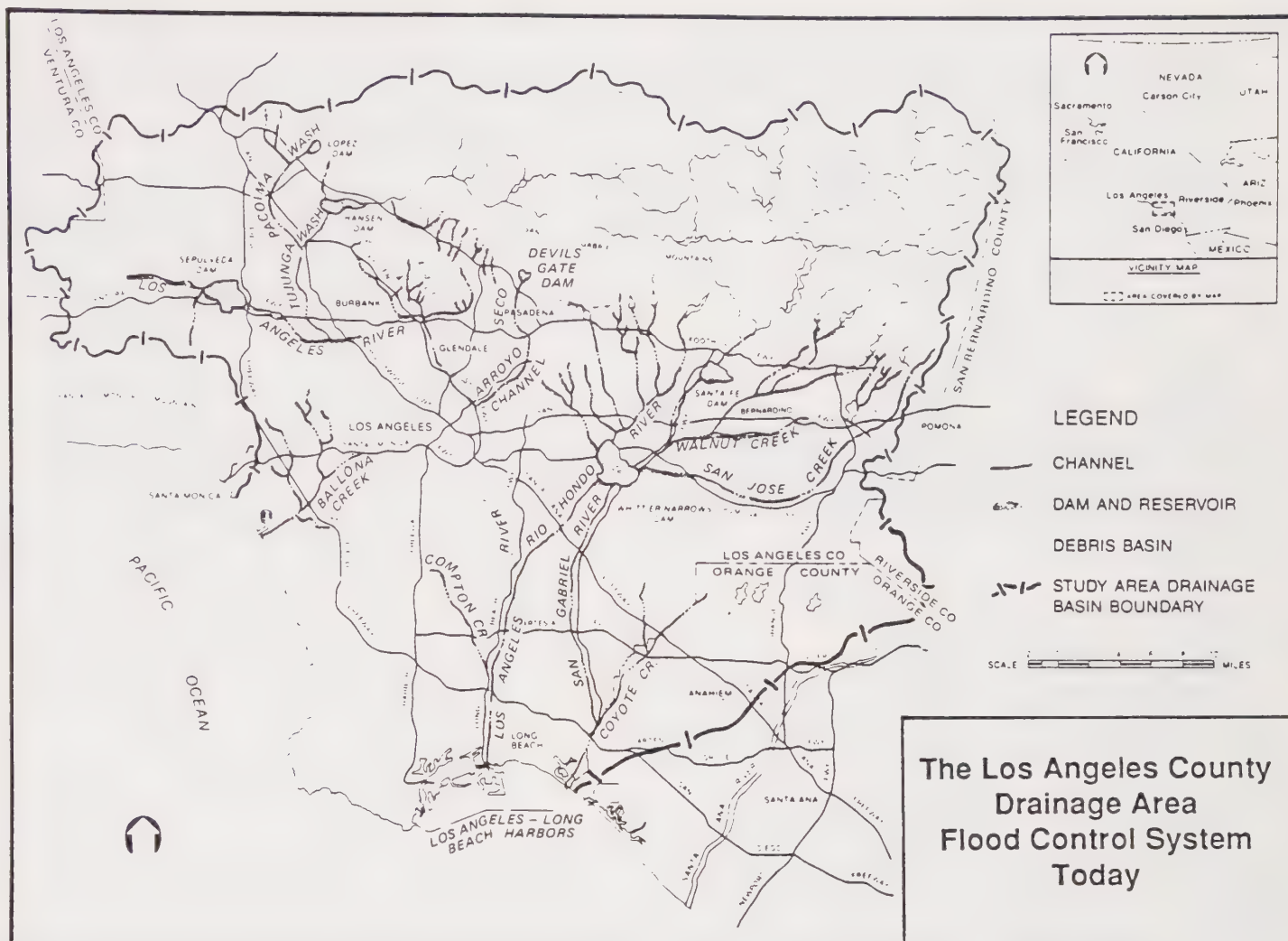
The 1980 series of storms was large, but it was nowhere near as large as storms that could strike the basin. The fact that the flood control system was barely adequate in 1980 suggests that it is no longer adequate to contain all the rainfall from mighty storms.

Early Flooding

Floods are a part of the history of the Los Angeles basin, which is built on an accumulation of sediment that major floods have carried from the mountains.

In the 19th and early 20th centuries, the relatively few people then living in the basin endured periodic flooding. The worst recorded case was in 1868. So much water jumped the banks of the Los Angeles River with such force that it turned the river's course. Before 1868, the river discharged into the ocean at Marina Del Rey. The monstrous flood moved the river about 15 miles south to its present course through Long Beach, flooding everything in between.

In 1916, a large flood inundated thousands of homes and businesses, and the gigantic 1938 flood cut Los Angeles off from the rest of the nation for more than a week. Flood water severed all rail lines and roads leading into the basin, injured hundreds of people, and left thousands homeless.



Destructive flooding hasn't returned to the Los Angeles basin since 1938 because of the construction of one of the most sophisticated, comprehensive flood control systems in the world. It is, in fact, the largest metropolitan flood control system in the United States. Built by the Corps of Engineers and the Los Angeles County Department of Public Works from the late 1930's through the 1960's, the system combines 500 miles of main and tributary channels, 20 flood control dams, and 125 debris basins.

Why the Concern Today?

Evidence has gradually accumulated to show that massive floods could return. Sediment building up behind Hansen Dam in northern San Fernando Valley is reducing the dam's flood water storage capacity. Flows in the rivers have been higher than predicted on numerous occasions. After 50 years of service, channel bottoms and side walls are badly eroded in some spots.

The 1980 storms were perhaps the most vivid evidence of concern. The 500 miles of flood control channel improvements contain about 50 miles of levees, which are manmade embankments that rise as much as 10 to 12 feet above the surrounding land elevation in order to increase channel capacity. Following the 1980 storms, inspectors found debris left from

the flood flow at the top of the levee on the Los Angeles River at Wardlow Road in Long Beach—evidence that the flow had exceeded the channel's capacity. If the previously mentioned seventh storm had occurred, it could have thrust water over the walls of the levee and into streets and buildings. And it could have destroyed the levee.

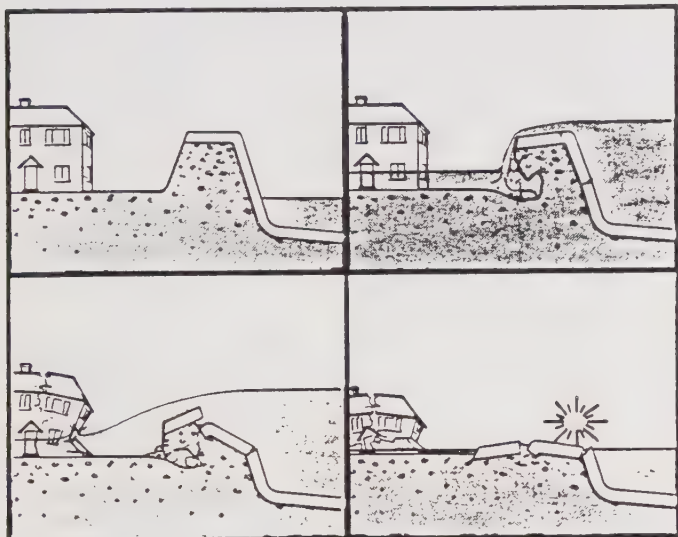


Illustration of how a levee could fail, releasing water into the flood plain. A levee is earthen, protected on the inside channel wall by concrete and by asphalt on the top. The outside of the levee is compacted dirt. If water escapes the channel and flows over the levee, the compacted dirt can erode in as little as 1 hour. The levee would crumble, releasing a wall of water into the surrounding areas. Destructive flooding would have then returned to Los Angeles.

NEW PLANNING IS UNDERWAY

Under Congressional authority, the Corps of Engineers, in close cooperation with the Los Angeles County Department of Public Works, is thoroughly reviewing the adequacy of the flood control system in the Los Angeles basin in order to recommend necessary improvements.

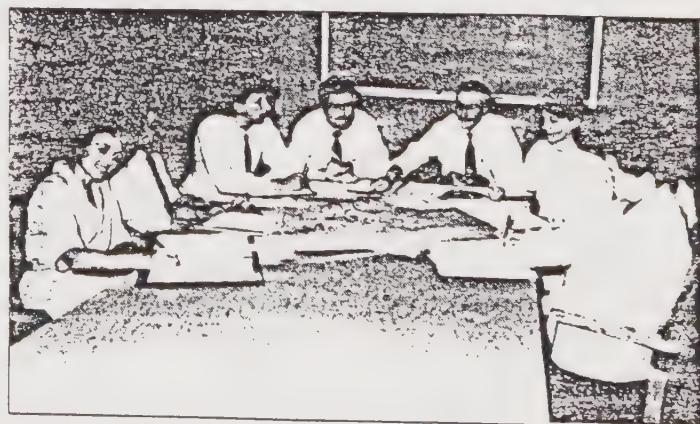
The basin, known as the Los Angeles County Drainage Area (LACDA), consists of 2,000 square miles with a population of about 8 million people. The San Gabriel Mountains bound the area to the north; the Whittier Hills are the eastern boundary; and the Pacific Ocean to the west and south receive the water from the two main rivers: the Los Angeles and the San Gabriel.

While the main objective of the system review is flood control, there are other important objectives:

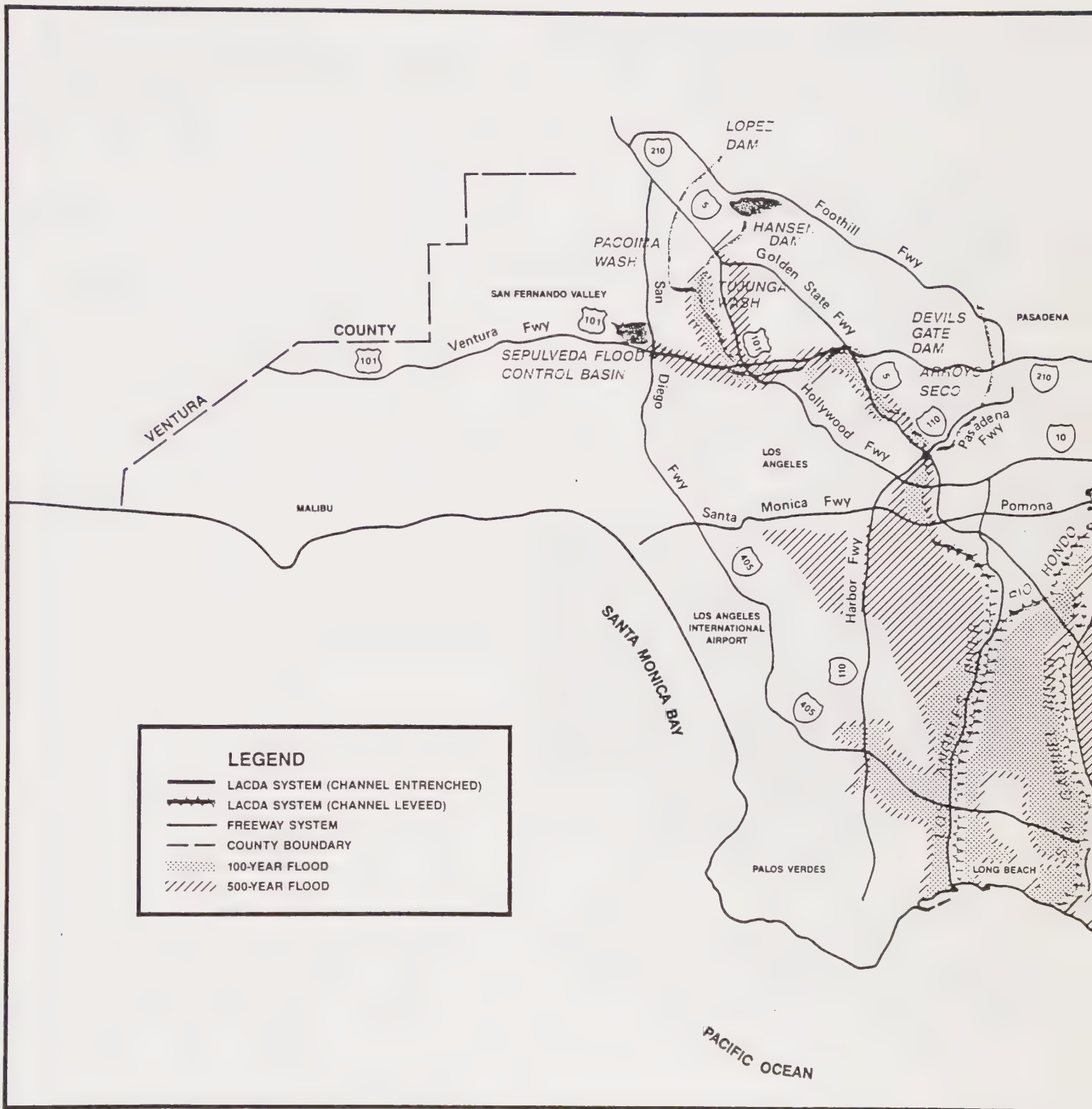
- water conservation to replenish groundwater basins,
- improvements to transportation,
- sediment management, and
- environmental and recreational enrichment.

Projects such as this have many complementary objectives because work on flood control often allows planners to meet other national and local needs.

The Corps and the Los Angeles County Department of Public Works have assembled an impressive team to work on the problems, including hydrologists, hydraulic engineers, economists, design engineers, environmental analysts, biologists, geographers, geologists, and recreational planners.



Staff members of the Corps of Engineers and the Los Angeles County Department of Public Works in a periodic LACDA study coordination meeting



Areas in the Los Angeles County Drainage Area threatened by 100- and 500- year floods

What Have We Learned?

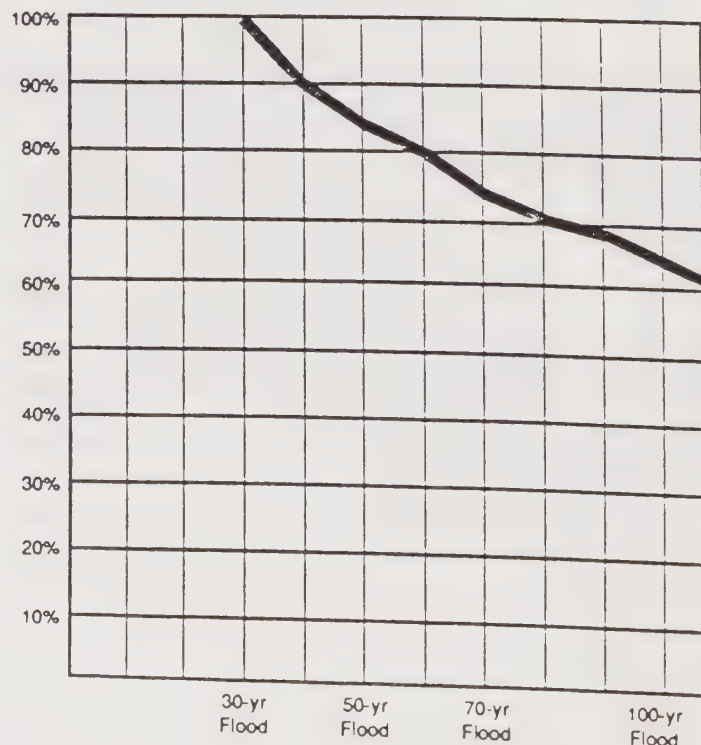
The Corps and the Los Angeles County Department of Public Works built the current system to contain the largest flood likely to strike the basin as predicted in the 1930's.

However, conditions that affect flooding have changed. Today, the LACDA system no longer protects large areas in the basin from enormous floods that, while infrequent, would bring on monstrous damages.

Analysts base their flood size predictions on potential rainfall and runoff rates translated into the total flow from a storm and the peak flow expected at any given point in the system. "Peak flow" is the highest expected level of water discharge. In newspaper, television, and radio accounts of flooding in other parts of the country, we frequently learn that flood waters are "expected to peak, or crest, at a particular time and then subside." Knowing potential peak flows is essential in designing flood control improvements.

Analysts describe floods of different sizes in terms of their statistically projected frequency: for example, 10-year, 20-year, 50-year, and 100-year. A 10-year flood has a 10-percent chance of happening every year; a 20-year flood, a 5-percent chance; a 50-year, a 2-percent chance; and a 100-year, a 1-percent chance. The risk of large floods in any year is relatively small.

The risk increases alarmingly, however, over longer periods of time. The chart below displays the risk over a 100-year period. A 30-year flood has a 100-percent chance of occurring one or more times in 100 years. A 50-year flood has an 85-percent chance; a 70-year flood, a 75 percent chance; and a 100-year flood, a 65-percent chance.



On the right:
Chances of floods of varying sizes occurring
one or more times in 100 years

LACDA



The LACDA flood control system does not have the capacity to prevent flooding from the 100-year flood, which would cover about 100 square miles. Indeed, flooding could result in some areas from storms above a 50-year size.

The 100-year flood could affect many areas close to the Los Angeles River in the San Fernando Valley and downtown Los Angeles, Tujunga Wash in the San Fernando Valley, and a large triangular area encompassing parts of Bellflower, Burbank, Carson, Cerritos, Compton, Downey, Gardena, Glendale, Lakewood, Long Beach, Lynwood, Montebello, Paramount, Pico Rivera, Signal Hill, South Gate, and Torrance. In some areas, flood waters could be as deep as 8 to 10 feet. Most areas, however, could experience flooding of about 2 to 4 feet.

Mud and water could weaken structures and would cover the floors of thousands of homes, businesses, and public facilities, damaging furniture, floor coverings, equipment, and other possessions. Roads and rail lines would be impassible. Communication and power lines could be broken.

The potential for an even larger flood also exists. A 500-year storm would add most of central Los Angeles, more of the San Fernando Valley, and large portions of the cities of Artesia, Bell, Cudahy, Hawaiian Gardens, Huntington Park, Industry, Maywood, Norwalk, Santa Fe Springs, Vernon, and Whittier to the flood plain.

Determining Where It Could Flood

Estimating the area subject to flooding from different size storms is not easy. Where water might break out of a channel depends on several factors, including where debris builds up to restrict or block further flow. If one of the bridges upstream traps the debris, the flood could begin there. But if the debris continues to bridges farther downstream, the upstream areas may be spared. It is also difficult to predict where water will go once it breaks out of the channel. To illustrate: a building that collapses in the flood's path may block the flow in one direction, diverting it in another.

Flood maps, then, are estimates based on the best data and analytical techniques available. While flood maps prepared by different government agencies may not be identical in their flood plain boundaries because of the level of precision necessary for special purposes, they all agree on potential flood sizes.

Why Doesn't the System Provide a High Level of Flood Protection Today?

There are several reasons.

Urbanization. The Los Angeles metropolitan area has grown far more than even the most visionary forecasters could have predicted before World War II. Population soared from about 3 million in the 1930's to over 8 million in the 1980's. Open fields once soaked up much of the rainfall. Only during intense storms would water run off those fields into the streets and eventually into the rivers. Today, however, buildings, roads, and parking lots cover those fields. Rainfall has only one place to go—into streets, storm drains, and rivers. The result is larger and quicker peak flows.



Los Angeles River looking upstream from the harbor, showing urbanization right up to the river

Storm drains. The flood control system itself has increased the peak flows in the major channels. Local governments have invested over \$1 billion in storm drains and channels to carry water away quickly from freeways and neighborhoods into the rivers. The water no longer ponds in local areas. Instead, runoff reaches the river channels faster and in greater quantity than ever before.

Sediment. Sediment is building up in the reservoirs, as engineers expected. The mountains that surround the Los Angeles basin contain easily erodable soils. Heavy rains bring mud and debris down the streams into the reservoirs, where the mud settles and gradually reduces reservoir capacity. Following forest and brush fires that burn thick ground cover in the mountains, heavy rains carry excessive amounts of mud.



Current sediment removal at Hansen Dam in the northern San Fernando Valley

To make room for the sediment, engineers “over-build” flood control dams to provide enough reservoir capacity for storing flood water and sediment. Design criteria in the 1930’s required a capacity large enough to store sediment settling out from water flowing into the reservoirs over a 50-year period.

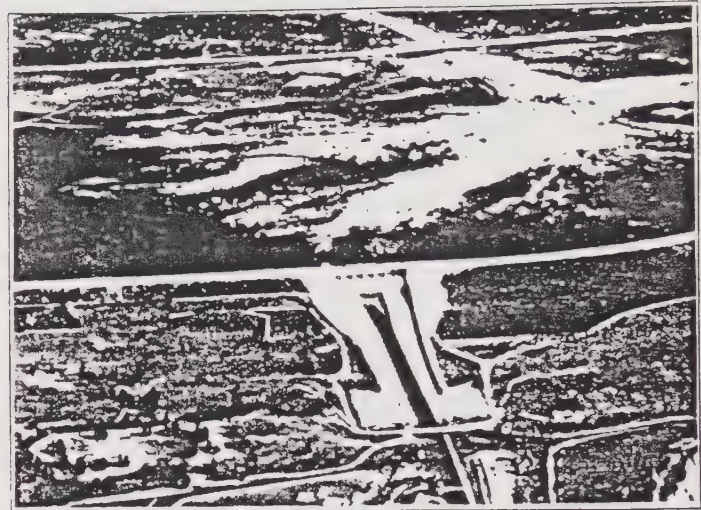
When the sediment eventually surpasses the amount the reservoirs were designed to hold, it begins to reduce the space for flood-water storage. During large storms, dam operators will have to release more water faster into the river channels below, which may not have the capacity to contain it.

Bridges and levees. Bridges may obstruct flood flows. Peak flows can approach the bottoms of many bridges that cross the channels. Bridge pilings can trap debris carried by flood flows, blocking or at least restricting the flow. When the water level reaches the bottom of the bridge deck, the flow backs up and can break out of the channel and/or create enough pressure to undermine the bridge. There are dozens of old bridges that cross the major rivers in the Los Angeles basin.

If peak flows exceed the height of a levee at any point, levee failure is possible—as feared during the 1980 storms.

What Can Be Done to Solve These Problems?

There are many ways to reduce the potential for flood damage. They focus on dams and reservoirs, channels, bridges, and diversion tunnels. Since the LACDA system is so complex, some combination of those measures is likely. The objective of planning for flood control is to develop the plan that does the most cost-beneficial job of reducing flood damages and achieves other important national and local objectives.



Hansen Dam and Reservoir

Dams and Reservoirs. In the Los Angeles area, engineers do not design flood control dams to hold back everything that flows into them during a storm. Here, flood control dams act like a funnel. When high flows enter the reservoir, they are constantly released through the dam’s gated outlets into the downstream channel at a rate that the channel can safely pass. Since there is a maximum release through the outlets, any increase in water flowing into the reservoir means that it will fill faster. Potential reservoir actions include changing current reservoir operations, increasing current reservoir capacity, and/or constructing new reservoirs.

(1) Changing reservoir operations.

Permitting higher and earlier water releases from the dams would increase the capacity of the reservoir for receiving high flows later in a storm.

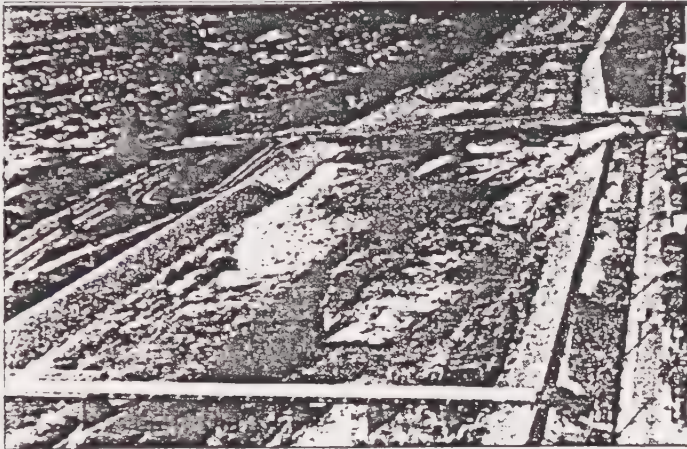
(2) Increasing current reservoir capacity.

There are 20 dams in today’s LACDA system. Raising any of them, and/or modifying their outlets, would increase reservoir capacity for both flood water and sediment.

(3) New reservoirs.

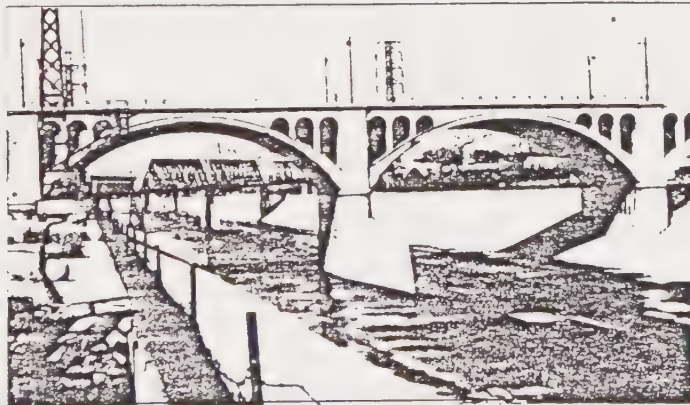
There are several potential sites in mountain canyons for new dams and reservoirs that would add to the flood storage capacity of the LACDA system.

Channels. They can contain the water flowing into them as long as those flows do not exceed their maximum capacity. Alternative ways to increase channel capacity include raising channel walls and levees, changing their configuration from trapezoidal (channel walls slanting outward from a narrower bottom) to rectangular, and widening and deepening. In addition, levee armoring on the outside, while not increasing channel capacity, would eliminate the threat of levee failure that would cause disastrous flooding.



The Los Angeles River Channel at Willow Street

Bridges. Bridge modifications or replacements to eliminate the current restrictions to flood flow would increase channel capacity.



Broadway Street Bridge on the Los Angeles River

Diversion tunnels. Constructing such tunnels would allow the diversion of flows from the rivers. For example, a tunnel from the Los Angeles River north of downtown Los Angeles could carry some flood flows to the ocean.

To Summarize

- Development over the past 50 years has steadily increased flood water runoff.
- New storm drains to serve that development have increased peak flows in the flood control system.
- Sediment flowing into the 20 reservoirs is decreasing their flood control capacity.
- Bridges, by restricting flow and by trapping debris, may cause flood overflows from the channels.
- Levees can erode and fail if flood flows exceed channel capacity.
- Destructive flooding is again possible in the Los Angeles basin.

The Corps of Engineers and the Los Angeles County Department of Public Works are now studying solutions to these problems.

YOUR INVOLVEMENT

Technically, engineers can design just about anything to solve the flooding problem in the Los Angeles basin. But all of the potential measures mentioned in this bulletin would have some effect on life in the basin. Raising dams or constructing new ones requires new land, changing how the community currently uses it. Channel improvements could also require the purchase of more land and could affect aesthetics. Bridge and tunnel construction would, at least for a few years, disrupt transportation.

The important point is that engineering and economic issues are not the only factors in choosing the best plan. Beyond what will technically work, planners ***must listen and pay attention to resident ideas, suggestions, desires, objections, and concerns.***

The Corps of Engineers and the Los Angeles County Department of Public Works have committed themselves to involving you in their planning process:

- How do you see the flooding problem?
- What concerns about potential solutions do you want them to consider?
- Are there other potential flood control measures that you want them to study?
- How do you feel about the potential flood control measures that they have identified?
- How important to you are water conservation, transportation improvements, recreational opportunities, and environmental enhancement?

It is impossible, of course, to reach and involve 8 million people. This bulletin is a start in trying to inform and involve as many people as possible. The Corps of Engineers intends to involve you through a series of public workshops and other meetings to give you the opportunity to contribute to plan development by discussing and answering questions such as those listed above. And the Corps will fully inform you about study progress and problems every step of the way.

The Corps hopes that you will share this bulletin with your friends and neighbors. If you need more copies and/or have any questions about the flooding problem and the study, contact:

Ira Arzt, Project Manager
Los Angeles District
U.S. Army Corps of Engineers
Water Resources Branch
P. O. Box 2711
Los Angeles, CA 90053
(213) 894-5465

If You Live in an Area Subject to Flooding, You May Want Flood Insurance

The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program, which makes insurance available to individuals in communities with a flood hazard if the communities agree to reduce future flood risks (for example, zoning restrictions in the flood plain).

FEMA is now updating the current flood insurance rate maps in the Los Angeles basin. Insurance rates and necessary flood-plain management measures will vary, for different size storms, depending on the depth of the potential flood waters and the boundary of the flood hazard zones.

FEMA expects that, because of increased storm-water runoff and other changing factors, the new flood insurance rate maps (to become effective in 1990) will expand the present flood hazard zones.

It is important to understand that FEMA does *not* use the flood overflow maps developed by the Corps of Engineers (such as the one highlighted on pages 6 and 7 of this bulletin) to determine flood insurance rates. The Corps produces its maps of *average* flood depths for relatively large areas *only* in order to estimate dollar damages—an essential calculation in evaluating the cost effectiveness of alternative flood control improvements under study.

FEMA, on the other hand, must compute more *specific* flood depths for smaller areas in order to make certain that the rates you pay are consistent with the risks you face.

You may purchase flood insurance *only* if your community is a participant in the Federal Flood Insurance Program. To find out your eligibility for flood insurance, or to obtain a free copy of the current rate map, contact FEMA's insurance servicing contractor for the National Flood Insurance Program at (800) 638-6620. You can obtain further information on community participation eligibility, hazard identification mapping, and flood-plain management from:

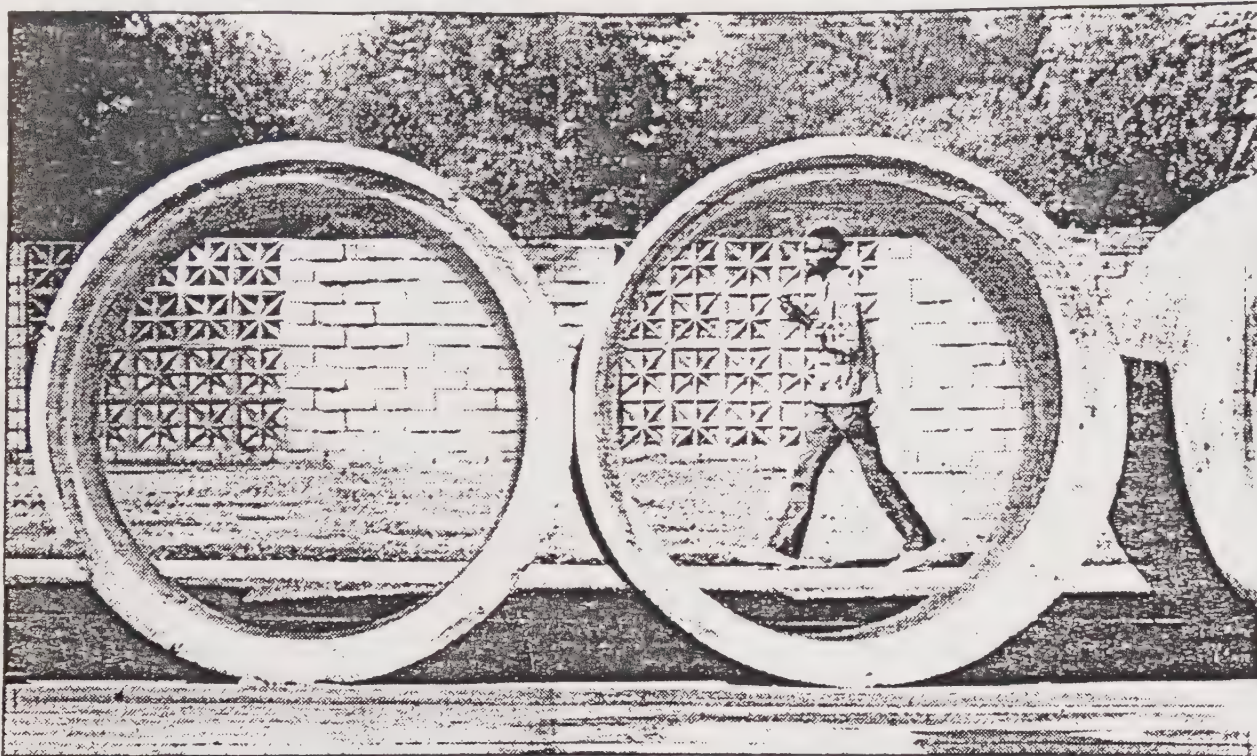
Federal Emergency Management Agency
Region IX
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VALLEY NEWS



KENNETH K. LAM / Los Angeles Times

Binocular vision—Storm drain pipes on Corbin Avenue focus attention on a passer-by.

Off-Duty Officers Told of Odd Behavior

Gunman Outside Church Slain by Police

By MICHAEL CONNELLY, Times Staff Writer

Two off-duty Los Angeles police officers fatally shot an armed man outside a Sun Valley church service after church members said he was behaving strangely, authorities said Monday.

The shooting occurred about 6 p.m. Sunday on a street outside Grace Community Church in the 13200 block of Roscoe Boulevard. The 39-year-old man killed was not identified pending notification of his family.

Detective Damon Loomis, 47, and Officer Shelley Gale, 36, were attending the service when they overheard church members tell an usher they had seen a man with a gun loitering outside the rear of the church, police said.

"He was doing things normal people don't do," Sgt. Sid Nuckles, of the Police Department's officer involved shootings squad, said of the man.

"He was running around talking to no one in particular, talking to himself, jumping around, acting

strangely. He was not holding the gun," Nuckles said.

Church members told the two officers that the gun was in the man's rear waistband or back pocket, Nuckles said.

When Loomis and Gale went outside, they spotted the man sitting in a car parked on Cantara Street at the rear of the church parking lot, police said. The two officers, who were not in uniform, approached the car and identified themselves as police officers, displaying their badges, police said.

"The suspect, while still seated in the driver's seat in the car, withdrew and pointed a loaded .22-caliber revolver at Detective Loomis," said Officer Joe Mariani, a department spokesman.

"The detective believed he was about to be shot by the suspect and fired two rounds" at the man in the car, Mariani said. Police said Gale also fired two shots into the car.

"The suspect was apparently unaffected from the gunfire and still attempted to point his gun at Detective Loomis," Mariani said.

al three times. The man in the car did not fire his gun. He was hit in the face and upper torso by the officers' shots and died at the scene.

Police said Monday they could find no explanation for the man's behavior. There was no evidence of drugs in the car, and detectives discovered no record that the man had mental problems, Nuckles said.

An autopsy to be performed later this week will determine if the man was using drugs at the time of the shooting, Nuckles said.

The officer involved shootings squad investigates all shootings involving police officers and turns its findings over to a grand jury.

Reflections

Perry Riddle is on vacation.

Man L as Sus 4 Slay

Prosecutors charges Monday men arrested the murder of View Terrace

Deputy Dist Jenkins said have sufficient Nash Newbil Terrace with b murder. Count Newbil owned block of Whe the killings oc said rock coca uted from the

Prosecutors es against a fi Monday. Jenki filed against L Sylmar. Whe police last wee the Sept. 25 Anderson, 24, race.

Also charged quadruple slay ant, 30, and Le of Pacoima. A Lake View Ter being an access

The defend the Aug. 28 Anderson Eng Calif.; her 28- Chemise; An and James Br Louis.

Wheeler, Br would face t convicted, ar the attempte English, the son. The boy ries during the

According s ant and Arm fendants in a murder charg dismissed and guilty to volun

THIS CONCLUDES THE NOVEMBER 18TH, 1988 PUBLIC HEARING TRANSCRIPT.

RESPONSES TO THE ORAL TESTIMONY RECEIVED AT THE
DEIR PUBLIC HEARING ON NOVEMBER 18, 1988

105. through 117.

These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.

118. This comment is not specific as to which impacts are understated; therefore no specific responses can be given; the purpose of the EIR is to evaluate physical changes on the environment, not lifestyle changes.

119. through 151.

These comments are related to the merits of the Draft GMP and are responded to in Appendix I of this report.

156. These comments are related to the merits of the RMP and are responded to in the RMP/RMP FEIR;

PUBLIC HEARING

December 15, 1988

ROBERT PATERNOSTER - City Manager, City of Long Beach, Testimony attached.

RAY REMY - LA Area Chamber of Commerce

Mr. Remy stated that his purpose of testifying is to seek a 90-day extension on the adoption of the AQMP. He feels that there is much to talk about regarding the issues at hand concerning the AQMP in that it affects the life styles of every individual that live within this basin. During his tenure of working in public service and the state, he has never seen quite the interest on the part of the private sector on any given public policy issue. A comprehensive overview with regards to employment, jobs, housing, transportation and environmental issue should be looked into in order to have an effective plan. Mr. Remy requested that serious and honest discussion of alternative plan. There have been plans presented by such companies such as Automobile Club; and So. Calif Edison. Both plans report to achieve standards sooner and less costly to attain clean. Whether this program does or not is subject to review and Mr. Remy would hope the Air District and SCAG will approach this process. The Chamber is aware that there are 2 economic studies commissioned by SCAG, and feel that the information contained in the studies should be seriously waived as decisions on clean air are made. Over the next 90 days the Chamber will be offering their assistance is participating with the debate and dialog. The statement of adopting a plan and then further discuss it, merely evades the issue, because when you adopt a plan you adopt the basic assumptions that will fit into the State plan and the Federal EPA plan. Those basic assumptions can not be changed. Look forward to working with SCAG, and hope indeed to receive a 90 day extension.

MICHAEL HERTEL - Southern California Edison

Mr. Hertel stated that the Edison Company does support a strong AQMP, one that is viable. The Edison Company defines a "viable plan" is one that achieve the federal clean air standards as quickly as possible and at the lowest possible cost. He stated that he is confident that with the extended time that was made available (AQMP 45 days extension) and with the spirit of cooperation, clean air can be achieved. He presented some slides which compared the Edison Company's proposal as compared to AQMD's proposal. Mr. Hertel stated that they did a cost comparison of \$4.1 billion for the cost of their plan as compared to the \$11 billion for the District's plan.

RON BATES - Orange County Division League of Calif Cities

I am here today to provide the collective prospective of the cities of orange counties on the GMP. While the goals of the plans have merit, we are concerned about the basic strategic concepts the job/housing balance. Our concerns generally relates to have a concept that is operationally defined in the plan and the lack of clear specificity for implementation. It was pointed out in the plan that several jurisdiction are currently using the J/H strategy in the development of their communities with the goals to become better balance. This approach makes good sense, we beleive however that the extrapolation of the concept through a regional prospective maybe seriously misplaced as operational wise in the plan. As we view it the plans suggest redirecting future incremental growth regionally by punishing individual jurisdictions for prior actions over which they have had only partial control. The plan assumes certain intervention into the market will result in predictable distribution of growth. Some of those assumptions we suggest are misinformed. One assumption is that future job growth is discourage one sub-region will automatically transfer to another. If that does not occur, the region could loose that economic growth entirely. Even if we are to add incentives for relocation as the plan suggest by taking revenue from one area and giving it to another to write down business cost, we still cannot mandate that a business moved to a specific location. Futher this plan clearly favors some areas economically and it's certainly okay, however, we object when this occurs at the expense of other sub-regional areas. We have several other concerns about the j/h balance such as its apparent lack of sensitivity to the type of new job development in some areas, and are collective ability to redirect that job development. A very significant concern rest with what we see that is obvious deficiencies in some of the implementation strategies. Specifically, we feel that the EIR is deficient in identifying the full socio-economic impacts of radically defining local government finance as suggested in the attached strategies. Neither the plan or the EIR identify the implications for existing city services if we take the incremental growth on sales, property tax, away from cities and counties. Ladies and gentlemen, I don't know about your individual jurisdictions but I do know that the vast majority of orange county cities rely on the growth of those incremental revenues that pay for salary increases, police and fire that exist in providing infrastructure projects for our local governments. We suggest that it is some what at this point irresponsible to local government financially to include such alternatives without fully addressing up front the implications. We do understand that some modification to the definition of J/H balance are being introduced, and think that it is a great idea and definately moving forward. We want to share some of specific concerns, so that you can appreciate the level of consideration that the Orange county cities have given to this particular issue. What we are asking for is that this process be delayed for 90 days in order to allow us to work with the staff of SCAG and the District to fully appreciate and identify the implications of the GMP, and certainly realized the difficulty you have in trying to put together a plan that is successful for the entire region, and do want to cooperate in that endeavor, but we want a plan and very much will support a well mean and balance approach issue which has widespread support and clearly embodies equitable treatment for all the communities involved. Thank you for your attention.

BOB DUNEK - Executive Director

Mr. Dunek representing the Steering Committee of the Orange County Division is concerned that probably most jurisdictions within the region may not appreciate the extent to which all of the regional plans. We find it difficult to find combine comments on particular plans solely on specific components. For example j/h strategy is a major under penny concept of all of the plans. We do have several concerns about how the growth management plan in the j/h balance is operationally define as Ron Bates previously mentioned. At this point we want to re-emphasize our concern for that concept to the extent that it is a component of the Regional Mobility Plan. In the letter sent to President Griffin we attached the recommendation of the cities of Orange counties on each of the plans. Those recommendations were adopted unanimously by the cities at the November 17th meeting. At this point however, I want to highlight our recommendations solely on the RMP. The city of Orange County essentially agrees with the recommendations of the OCTC on the RMP which included: 1) that the RMP should continue to be reconcilled with the Orange county 20 year transportation development plan as it is now developing. 2) that SCAG should reexamine the feasibility of the finances requirements for the plans both in terms of the overall costs if possible in political support. 3) that the j/h demand matters be re-evaluated to set more resonable goals to which we have the need to re-constructualize the operational definition of the j/h balance; and 4) that SCAG should reconcile demographic projections with those of other agencies. The fifth recommendations by the city outline the requirements that SCAG develop the consensus with local jurisdiction regarding the establishment of any regulatory structures proposed for regional administration. There is a recommendation adopted by the cities of Orange county which actually apply to all of the regional plans, and that was presented by Ron Bates, we are requesting that you continue adoption of these plans today which apparently will happen. We feel more time is necessary to build wide spread support in a solution for a regional problem and to address the substances and defienicies within the current plan. We are asking however that SCAG undertake another approval process for these plans. We believe that this is a significance and vital important issue that the Executive Committee of SCAG should be guided by a vote of all the affective jurisdiction during the General Assembly. We certainly appreciate the hard work and dedication of the EC and very much respect your abilities but we believe these plans -- and if the implementation is to be successful, must rely on the support of the jurisdiction. An action of the General Assembly certainly affect a much wider franchise an empowerness of all jurisdictions of the region in their stronger commitment to the plan. We think this process is the right thing to do. I also want to thank you for you on-going support of the AQMP. Tomorrow Counc. Richard Ackermann of Fullerton will represent the interest of orange county cities before the AQMD. In consistent with our views on the other plans we believe that efficiencies go far beyond questionable procedures and want to urge serious evaluation of the AQMP in some areas of substance. In our opinion the time delay must be put to good use so that a well balance plan may be acted upon next Spring. Thank you for your attention and on-going dedication.

EVELYN HEIDELBERG - Calif Council for Envirmtal and Economic Balance
DAVID HARRISON

Testimony attached.

MARK FUTTERMAN - LA Amer. Institute of Architects

Our Chapter is committed to the quality of the environment in which to continue our leadership community role as designer and caretaker of this environment. We submit the concept of regional planning and management, the cost which is undertaken and key elements of the proposed SCAG and AQMD regional planning. We further believe that the region needs to undertake its responsibilities to maintain our own control of the planning, legislation and decision making and limit the possibility of outside interventions. We commend the major efforts of SCAG and AQMD. Your proposed plans is right to the core. They will have enormous impact on all of our lives, impact to which the plans themselves are very difficult to understand. We believe that your proposed plans are just the first step of the process and that much more needs to be done. We urge SCAG and AQMD to undertake significant additional studies of the social and economic impacts of the proposed plans and communicate these so that people can understand because their lives and livelihood will be affected and encourage more public debate about the alternatives. The LAAIA is particular concerned with the following issues: 1) SCAG and AQMD plans be coordinated with the goals and objectives of LA 2000; 2) that there is clarification of the relationships between landuse and transportation components of the plan and impact urban form and a variety of regional- sub-regional and local status. This should include futher study of the galaxy concept and other new prototypes and models, transportation facilities including, alternative fuels and demand management, open space and conservation, and energy and conservation; 3) that an urban element included in the planning process which interpret and visualize the effects of policy upon urban and architectural form an area which we think the plans do not adequately address and which is critical for the implementation. Establish a process in which regional and larger scale directives can be achieve through sub-regional and local design and create a new form of qualitative control to reform and/or replace zoning codes and regulation; 4) thinks there needs to be further study of the impacts of the restrictions on coding, solvents, deliveries and building processes among other among the building industry. The Board of Directors and LAAIA will instruct its committees to research analyze, report and make recommendations concerning these regional plans to the LAAIA Board on an on-going basis. Discuss these issues with other AIA Chapters of So. Calif. and sponsor local seminars and other events to discuss alternatives positions to develop some consensus about action. Further more to assist in a more comprehensive understanding of the architectural and urban design implications of all of the proposed actions.

EDRIC GUISE - BIA of So.

Testimony attached.

DAVID CAHN - So. Calif. AQ Alliance of CMA

Because of the developments on the continuance on the actions on the EIR and AQMP. I'll change my comments a little. But I did want to refer back to the June meeting, when these documents were first release. At which among several recommendations I recommended the public be truly advised of the impacts and costs of these programs, and secondly that the scientific issues regarding the correct control measures strategy the ROG vs NOX be resolve in a technical not a political nature. In the intervening months, I believe that neither of these objectives have been achieved. We still have 2 or 3 alternatives control plans being battered about and as of yet there has not been a scientific agreement regarding which combination of these plans are correct. Secondly, have several economic studies one of which -- on the District's part estimated the cost of sixty cents per day per person. Since it appears it is going to be a continuance of these matters, and I will echo Mr. Remy's comments and strongly urge that this be a period for thorough analysis and if necessary revision of these plans, and not just a tip of the hat to seek requirements for additional public notice and public input. It was very interesting to me to read in the EPA advance of public rulemaking on the federal implementation plan the following comment "with regard to their observation that an approved AQMP could end up in their hand in late spring of 1989". Based on that timing EPA says that "if this draft plan is submitted to EPA it will proceed by at least 2 years of the national submittal deadline for post 1989 SIPS suggested by EPA post 1987 ozone CO policy proposal. I mention only to dispell the idea that there is this draconian sort of tamistry over our head in the basin if we don't adopt a plan as quickly as possible and send it off to EPA. I am not suggesting delays in the manner of the time period much greated than the 90 days, but what I'm saying is let's take the time necessary to resolve the issues of the correct control strategy to adequately determine the economic impact of the strategy and to give the media time to get this word out to the public. Let's stop the bickering back and forth between good guys and bad guys and trading of accusation and get the people to understand what this plan will be, and if this takes 100 days or 10 days than that should be the time schedule it should be. After I think we all want this plan to succeed, and we are asking for this delay not for the sake of delay of which we have been confused quite often. The reason it is so important we feel that indeed the public understand what the impacts are before the plan go into effect. To find out that we have taken the wrong path on control measures, or to find out that there are major economic and socio-economic impacts of these plans which people are not aware of, will create a back-lash and could possily derail a plan that we have spent so much time in putting together.

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STEPHEN KAUFMAN - Sierra Club

Mr. Kaufman stated that he is offering comments of a general nature that we endorse the intent of the draft but urge some changes be made in both policies in detail as suggested in our letter. We have supported Metro Growth Management and policy statements drafted as early as 1977 and we afford this effort as a first really meaningful metropolitan step to attack a serious problem generated by the region's rapid growth. But it's only the first step. We hope that SCAG will not wait 5 years for something to happen. This fast growing region cannot afford any delay and it will take 174 years I'm sure just to get the correct machinery in place. On a related matter of growth control initiative (Chapter 5 Appendix 6) take very negative views of a desperate public effort to set things right. SCAG should appreciate the growth control movement and seek to guide it in a more constructive direction, and not side so completely with the development industries' scare tactics. Significant open spaces in relations to growth management is seriously neglected in the report. Therefore in the urban an sub-regions and there expansion in the others are ignored in the body of the report. Appendix 3 even though resorted to urban form completely omits any mention of open space as a counter point to development, giving form articulation and breathing space for the urban region, nor does it acknowledge open spaces as gradual and relieving the uniform blandness of ----- residential development. These are serious facts to which I hope 175 will respond. The presence if Appendix 5 in regional open space item 7 summarizing are not sufficient either. More specifically item 7 of course ignores open spaces within the urban and urbanizing region because appendix 5 concentrates mainly on components of an outer area. The full report ignores the fact that as population grows now there is even more need for open space to relieve the crowding and the spreading. This is a regional as well as a local issue which requires regional guidance as to standards and policies in this growth management. In conclusion we would like to add a comment or two on the overview integration on the three plans. Finally to reiterate our satisfaction that this is the first SCAG plan to include a Growth Management proposal we are glad to see a grasping an trying to handle growth control and guiding into productive and regional and local channels. We think the report will be a good step forward.

BETH LEEDS - Envirnmтал Protection Consultants

Would like to go on record with regards to your proposals concerning energy conservation and mass transit, and also clean burning fuel. Most Californians wait the opportunity to be able to purchase clean burning 176 fuels. Pat we want to give your our commitment and our support. We want to modify our lifestyles by participating in some type of project for clean burning fuels. Thank you for the time.

CAROLYN WOOD - Laguna Beach

A major concern is the implementation portion of the program. That was brought out that there will possibly be a regional local task force set up to do this which I feel will be very helpful and is absolutely necessary. There are 2 major concerns that we have are 1) j/h balance based on just statistics. With reference to an article in the OC register which stated that it looks like more jobs coming to SOC that will be reducing our congestion. Taking the # of jobs and opportunities based on the # of housing opportunities and if you reach a certain bound it breaks. South Orange County (SOC) has a UPS depot. The concern is that people who work in OC would not be able to buy locally. Anyone buying in OC today with the exception of affordable homes, have to work somewhere today, and have to have nice salary to afford homes. 15% of people living in OC could qualify for an affordable home in OC, so the concern is that we are developing these jobs that on the surface looks like it is balance, but in fact every job that you create is requiring someone outside the area to work. The concern is that we are balancing the traffic. This should be look at on a regional basis and looked at for reality not just what statistics say. Comments on Transit - stated that she was born in LA and raised and at that time they had red-street cars, no buses, you had no alternatives. There was one car per family. During the war there was gas rationing -- what happened every one used public transit -- there was no alternative. During the oil-embargo we had a big increase in use of mass transit -- because there was no alternative. Now it has been said during the Olympics we had everybody cooperating, but everyone knew it was a limited thing. So you cannot change legislative behavior you have to have real need or a crisis. I think there should be consideration giving to -- instead of building your freeways first use or focus on transit. I support your program and wishes SCAG success.

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MARIELLE LEEDS - Resident of Laguna Beach

I came here by carpool and look forward to being able of having a choice and also look forward to having a choice of my mode of transportation in the future. I would like to commend the SCAG and AQMD and the speedy response to public comments. In orange county public comments usually takes months and they are not very adequate. I support AQMP but have the following concern pertaining to air quality: As far as health I have the pleasure of knowing a lady that lives nearby, and she is 86 years old. She has been told by her doctor she have acquired a very serious health condition that is the direct result of poor air quality, and he suggested that she move to another area which is less polluted. She has live in orange county for 40 years and does not desire to move away. However, this air quality of the region does improve she will have to move. She is now losing hope and feels that not much can be done, and then it's probably too late anyway. I told her that something is being done and I told her about the AQMP and said hopefully it would get the ball rolling for cleaner air. On a local level I wish that our OC Bd. of Supervisors would stop continuing doing business as usual with uncontrolled growth and help to improve our existing over-capacity systems and infrastructure. I too hope that your implementation plan is as strong as the plan itself, because I know Orange county has been talking about growth management and I also know that when you talk about implementation there's nobody home.

I have you have a strong implementation program. It is my hope that you don't delay the project any longer, there is a study that I read about economic impacts, and it reminded me a little bit of a college study about the sensible growth issue and that study (Chatman college) seems pretty bias in my opinion as far as the impacts that it would create, but also reminds me of this one -- this plan will cost each household a certain amount per month, well if the plan isn't implemented what will it cost per month in health bills. I'd like to see an economical impact of the policy.

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STANLEY HART - Sierra Club

I agree with most of the people that have presented their comments today and the fact that there should be a delay of at least 90 days in regards to the Plan. The RMP and the EIR is a flaw. It is flawed because it does not deal with central issue especially in transportation air pollution problems as well as the economic and social concerns. I'd like to illustrate my open remarks with a statement in the RMP in Pg 26 paragraph 7: "That our purpose of the automobile is immutable. We disagree. This preference which is essential to the entire LA syndrome is the result of a staggering substance which are tolerated by our community to the automobile. Since we identify the problem as being attached to economic factors the problems can be resolve only by correcting the economic tilt towards the automobile and truck. We don't want to be negative in this matter and we are making 3 positive action items which can be usefully included in the RMP. We feel that a 5th strategy should be added to the 4 strategies listed on page I-4 that stratey is correction of the gross market failure in the automobile and truck sector in and the economic factors. 2) that parking management techniques be required to tax or otherwise be required to be paid for by the user. So that the market place can function in the commuter area. At present time many large commuter employee groups are provided free parking which add enormously to the burden of commuter traffic. 3) finally the RFP Should include a commitment by SCAG to support a state-wide initiative to the following things: It should revise article 19 of the state constitution, more specifically this issues should include the following items: when gasoline tax, license fee and tax mileage tax shall be used to maintain roads and freeways, provide police and fire protection for motorist and truckers as well as all other services relating to the trucking industry. There should be a provision that property and sales tax be used only to support schools, police, fire department and libraries and other local governments unrelated to automobile and truck operations. 4) that property and sales taxes be lowered to an acceptable levels in an orderly fashion and that gas taxes be raised to accomodate these requirements. Provide that the gross tax level and encompassing local government tax sources shall not be permitted to be increased. In the RMP it states that the solutions will be expensive and we agree. The solutions suggested by the RMP certainly will be expensive in fact I believe the expense level is understated. However we believe that our suggestions when implemented will save the community billion of dollars annually. We wish to leave you with this thought, there is really no alternative to breaking this market place catastrophe.

ROBERT GETTS - Western Oil and Gas Assoc.

We are one of the organization in the area that has proposed an alternative to the AQMP. Over the past several months our Association has been involved in a very thorough review of the AQMP and we've been getting a lot of assistance from outside experts in the field of air quality. Using the same computer model and additional data use by the District in formulating their proposed plan, the Association is attempted to determine if there is a more effective and helpful alternative to the path to clean air. Our analysis thus far indicate that while the District's proposal is certainly a good step in the right direction there is at least one and possibly one alternative that could indeed provide residence of this region clearer more helpful air in the proposed AQMP. The alternative we have identified not only meets clean air standards faster but does not rely on the unknown technology as does the District's proposal. Under the "better off alternative" (as we refer to this plan) concentrations in the basin will be reduced about 20% by the turn of the century than they are in the proposed AQMP. The number of people exposed to ozone levels higher than the federal standards will be reduced 80% below the level reached under the District's proposal, and the number of people experiencing significant lung discomfort after heavy exercise through the high ozone would be reduced about half the number affected similarly under the AQMP. This alternative that we are referring to doesn't really alleviate that much from the District's proposal. First the alternative focuses its primary attention on reducing ozone. This pollutant is recognized by most scientist as posing the greatest health risk to people. It is also the pollutant that exceed standards by the greatest amount. Rather than to attempt to reduce simultaneously the major components of ozone reactive organic gases or ROD or NOX as the AQMP attempts to do our alternative places emphasis on reducing ROD. Scientific evidence indicates that reducing ROD will lower the ozone levels faster and thus provide much greater health protection to million of people in the LA Basin. We would like to point out that the local alternative for incorporates 98% of the District's proposed ROD measures many of these directly affects our operations in this basin. But it goes much further than a AQMP that call for stricter controls on ROG emissions. It will also eliminate the need for a number of tier 2 measures except the requirement for reducing ROD emission from solvents and coding. We have been briefing SCAG staff, some elected officials, and we are urging the District to thoroughly evaluate our proposal and the other information that is surfacing in the community not only on alternative measures but the socio-economic data. We think this information is very important in producing a plan that will give this area the cleanest most helpful air.

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Testimony of the City of Long Beach
on the
Draft Growth Management and Regional Mobility Plan

December 15, 1988

The City of Long Beach is pleased to have the opportunity to comment on the draft Growth Management and Regional Mobility Plans prepared by SCAG. These are, perhaps, the most important documents ever prepared by your organization. They clearly identify and attempt to quantify the three major, interrelated problems facing our region: growth management, transportation, and air quality. They also recommend actions directed toward solving these problems, actions which are often costly and politically difficult. We applaud SCAG for taking this initial step in addressing the truly monumental problems which face us as a region.

The City of Long Beach supports the goals of the draft Growth Management and Regional Mobility Plans. We also support the basic strategy proposed for achieving these goals, a four-pronged approach which combines growth management, demand management, facilities development and system management. With regard to the recommended specific programs and actions, we note that many are sketchy in their description, are apparently complex and costly to implement, and require voluntary compliance by local governments and private entities. In light of these factors, we cannot at this time give our unequivocal support to each and every recommendation.

We recommend that SCAG undertake the following actions to build the support and mechanisms necessary to implement the goals and strategy of the Growth Management and Regional Mobility plans:

- o Convene a regional task force of leaders from the public and private sectors to raise the regional consciousness of the major problems which face us, and to build consensus toward solutions or toward the creation of entities which can plan and implement solutions at this scale. The City of Long Beach is fully prepared to participate in such a regional task force. (Note: This recommendation was included in the City's testimony on the draft Air Quality Management Plan on October 22, 1988.)

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- o Create a management information system which will track progress toward achieving the goals of the new regional plans, on a regional-wide basis, on a sub-regional basis, and on the basis of individual jurisdictions. Since implementation of the plans is not based upon centralized authority, but rather upon voluntary compliance by every local jurisdiction, it is important that each jurisdiction understand its responsibility, be aware of its degree of progress, and be held accountable among its peers in the region.

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- o Create a mechanism for establishing the sub-regional coalitions of jurisdictions recommended in the plans. The sub-regions depicted in Figure 1-2 of the draft Regional Mobility Plan should not be considered final. Rather, local jurisdictions should have some flexibility in forming sub-regional coalitions based upon guidelines set forth by SCAG. These guidelines should emphasize communities of interest, perhaps defined as reasonable service areas for sub-regional multi-purpose activity centers. It is our understanding that attainment goals for jobs/housing balance, provision of affordable housing, and air pollution emissions will be allocated to these sub-regions.

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The draft Growth Management Plan places major emphasis on the need to create a better balance between jobs and housing throughout the region. The City of Long Beach supports this objective as a means for reducing peak hour traffic congestion and air pollution. We believe that this concept is consistent with the concept of sub-regional multi-purpose activity nodes, of which downtown Long Beach is one of many. We recognize that market forces tend to lead to improved job/housing balance over time, and we assume that the draft plan accepts and attempts to accelerate this natural trend.

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Our support of the goals and strategy of the draft Regional Mobility Plan is somewhat tempered by a skepticism that the large modal shifts required for achievement of the goals can be achieved in the time frames prescribed. We are especially concerned that projections for telecommunications/work-at-home and shifts from auto to transit may be overly optimistic.

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We also offer the following comments, listed by page number of the draft, on specific recommendations of the Regional Mobility Plan:

p. V-16 Improvements shown for the Rt. 710 north of Rt. 405 should continue south of Rt. 405 to Downtown Long Beach. This is necessary to serve the projected growth of Downtown, the Port, and the Queen Mary/Disney area.

p. V-16 We question how priorities were established among proposed freeway improvements. We note improvements to both Rt. 710 and Rt. 405 through Long Beach are included in the group for which foreseen funding is inadequate, whereas many of the freeways in the periphery of the region which might contribute to further urban sprawl are included in

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the group for which funding is likely to be available. We recommend that improvements to Rt. 710 and Rt. 405 be assigned higher priority.

p. V-24 The southeastern terminus of the proposed Coast Light Rail Line appears to be San Pedro. This line should terminate in Downtown Long Beach where it will interconnect with the Long Beach/Los Angeles Light Rail Line.

p. V-34 As the operator of and the city most directly affected by one of the region's commercial airports, we request participation in the Airport Impact Mitigation and Management Study, the Super 150 Program, and any other regional airport studies undertaken by SCAG.

p. V-39 The designation of the Consolidated Railroad Corridor should be changed to the Consolidated Transportation Corridor, reflecting the fact that the proposal for improved access to the Ports of Los Angeles and Long Beach involves both a consolidated rail line and a truck expressway.

p. V-49 The map of the highway system of regional significance should not include Ocean Blvd./Livingston/Second between Rt. 710 and Pacific Coast Highway. Land use and transportation planning in the City over the last decade have recommended that steps be taken to reduce potential regional traffic flow on this scenic coastal route.

p. VI-5 It is our understanding that the proposed benefit assessment is intended to apply only to proposed heavy rail corridors. This should be made explicit in the text. Any region-wide assessment

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Cont

would hamper the ability of local governments to institute assessment districts and developer fees to finance local street and road improvements as recommended on page V-18.

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Cont.

As noted above, the City of Long Beach views the adoption of a Growth Management Plan and a Regional Mobility Plan as only the first step in a regional problem-solving process which demands the highest level of inter-jurisdictional cooperation. We commend SCAG for taking these initiatives. We pledge our support toward implementation of the recommended goals on the basis of an equitable region-wide strategy.

NERA
SACTO

ECONOMIC IMPACTS OF THE DRAFT AIR QUALITY MANAGEMENT PLAN
PROPOSED BY
THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

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Presentation to the Southern California Association of Governments

December 15, 1988

NERA Study of The Draft AQMP

Costs and Benefits

Impacts on the Poor

Health and
Employment Impacts

Feasibility

Alternatives

Recommendations

The Draft AQMP Will Be Enormously Expensive

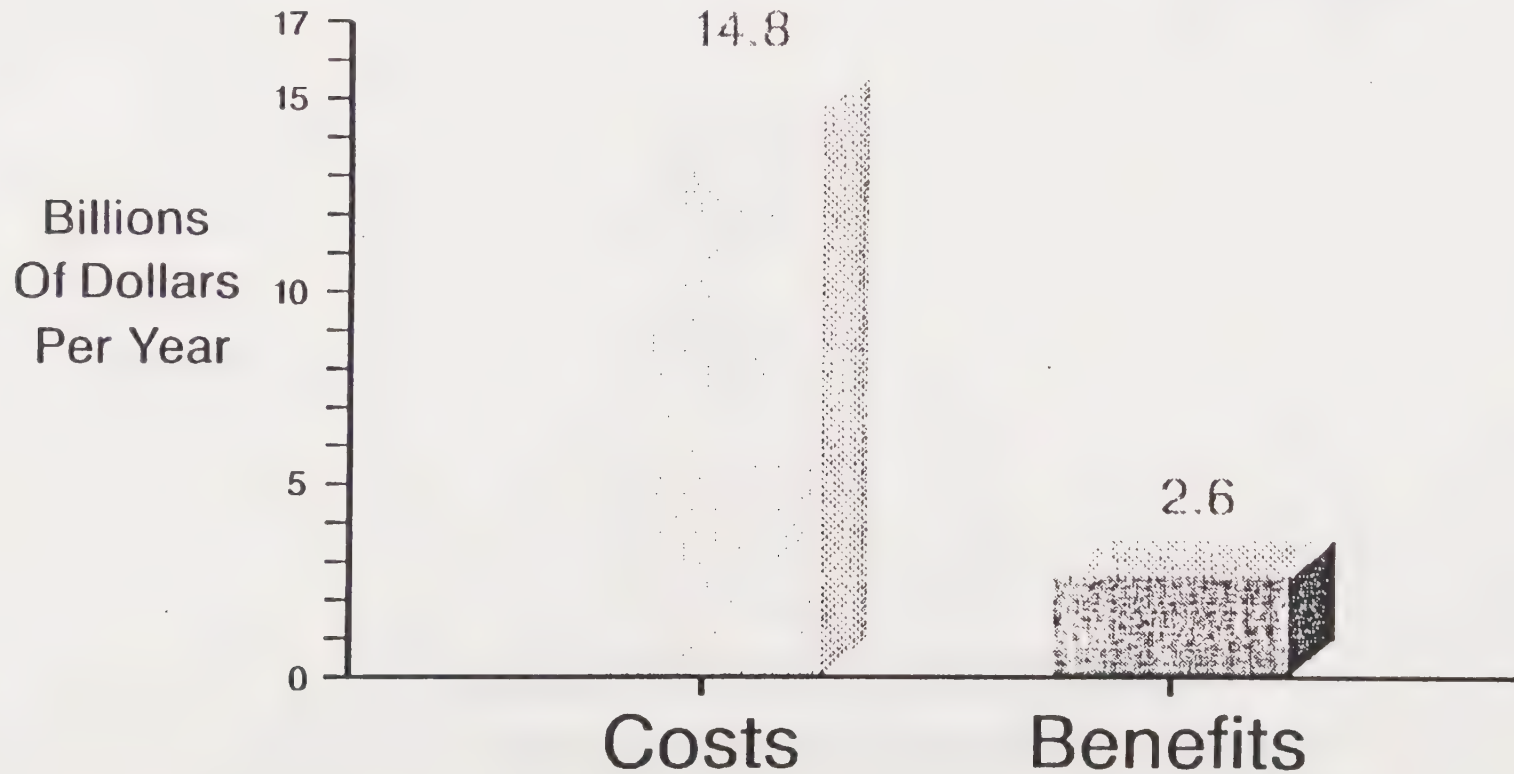
\$14.8 Billion Per Year Overall

Greater Than Total California
Sales Tax Revenues

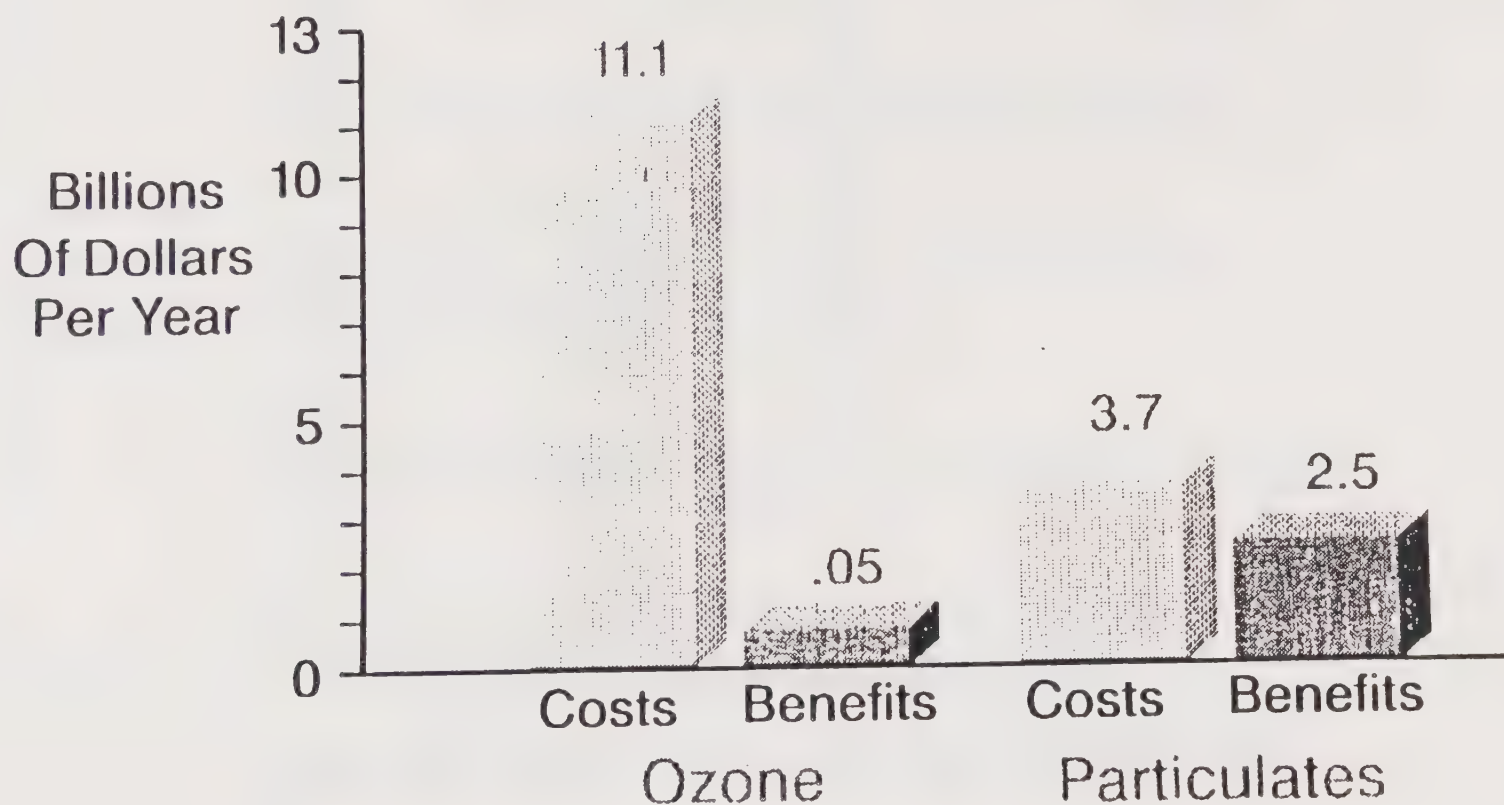
\$2,500 Per Household Each Year

\$50,000 Per Household as a
Lump Sum

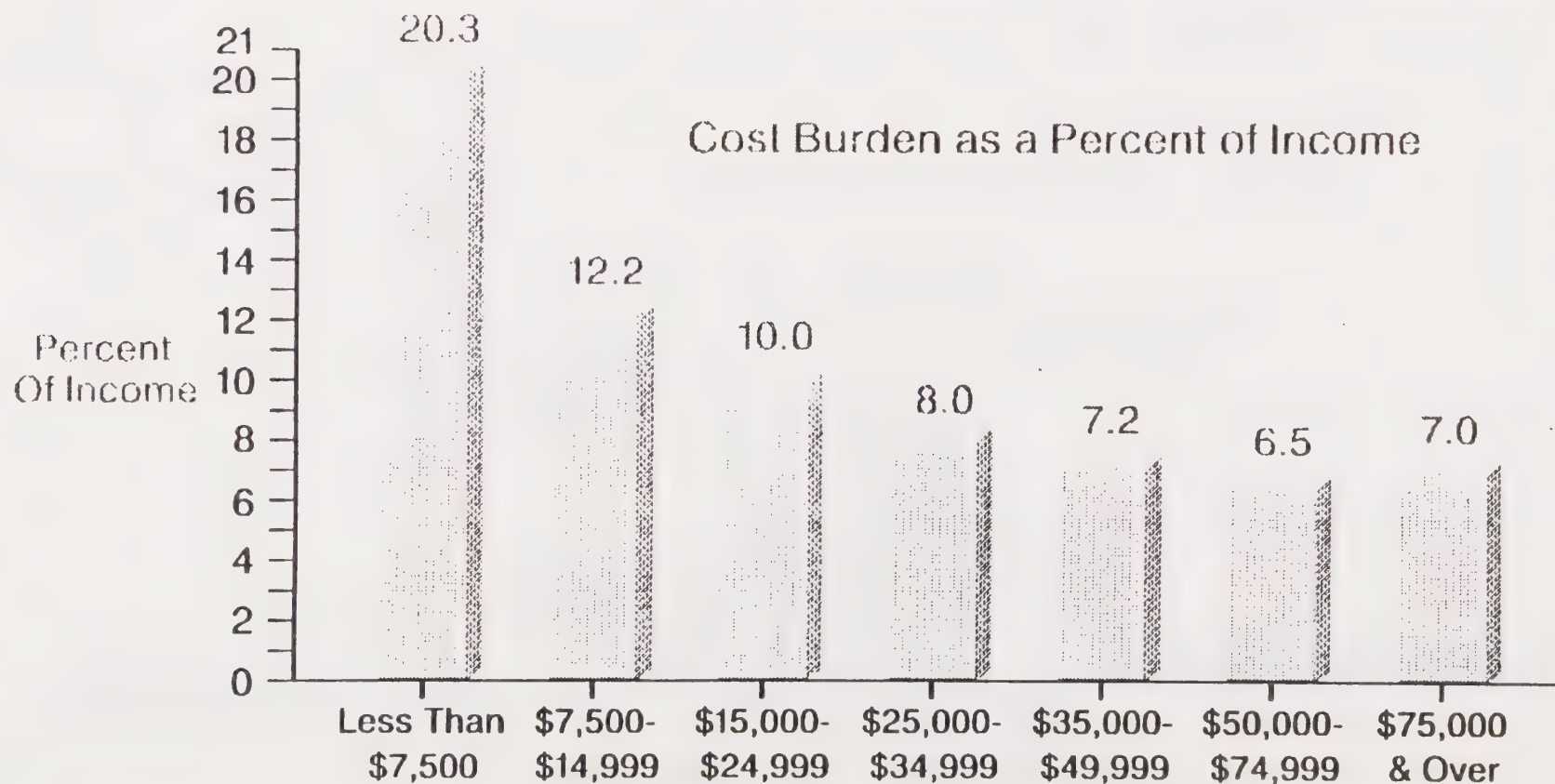
The Costs Are Much Greater Than The Benefits



Ozone Benefits Are Less Than One Percent Of The Costs



The Draft AQMP is Like a Sales Tax That Hits the Poor Hardest

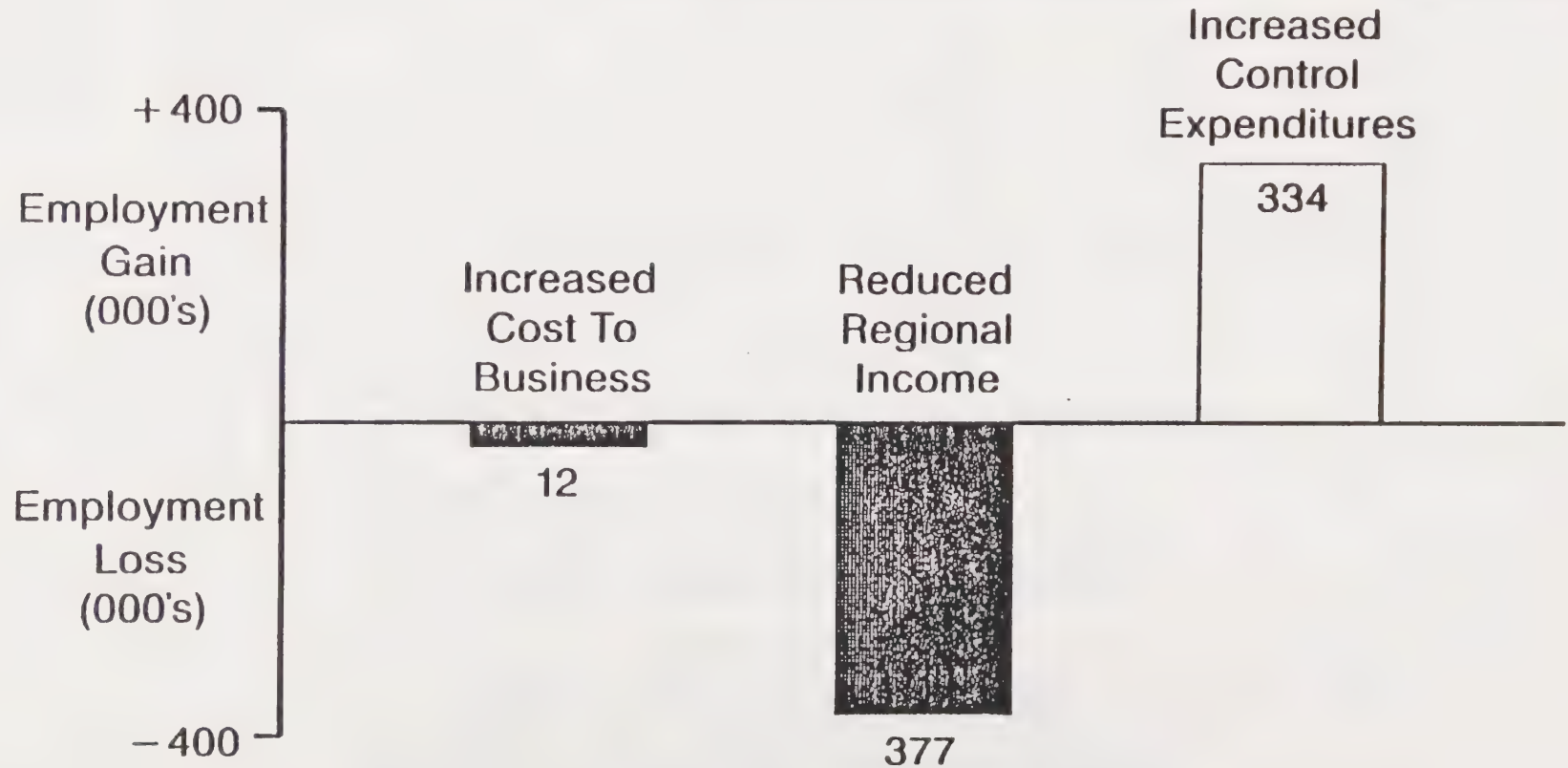


Impacts on Health and Employment Are Significant

Reduced Personal Income
May Lead to 4,000
Premature Deaths Each Year

Control Requirements May
Lead to 55,700 Lost Jobs

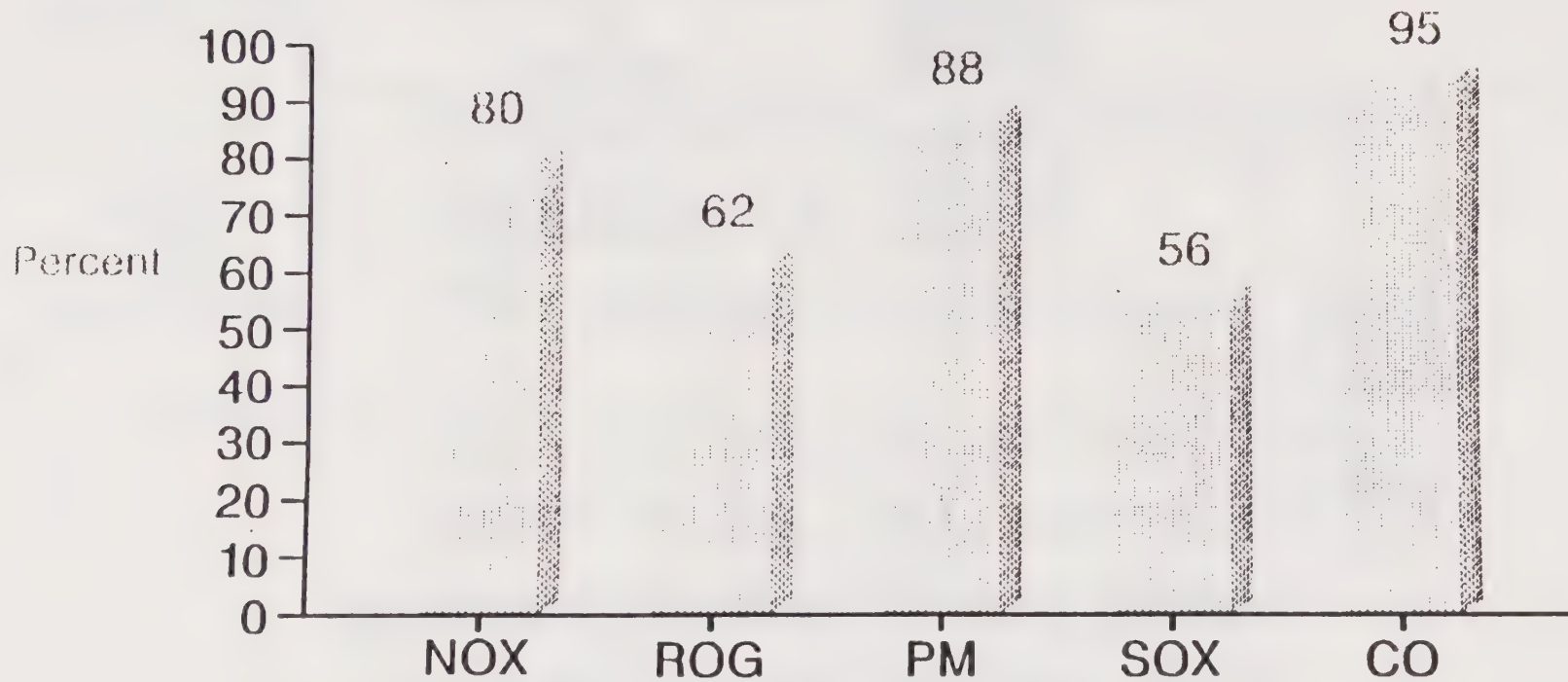
Employment Losses Will Exceed Employment Gains



Net Loss: 55,700 Jobs

Many Control Measures May Be Infeasible

Percent of Emissions Reductions
Outside the Control of the SCAQMD



Dramatic Increases In The Benefit-Cost Ratio

Relax Controls on Ozone

Get the “Biggest Bang for the Buck”

- ROG rather than NOx
- Cheap rather than expensive control measures
- Cost-effective rather than stringent standards
- Regulatory flexibility rather than rigidity

NERA Recommendations

Revise the Draft EIR

- Comparable benefits and costs
- Impacts on the poor
- Quantify indirect impacts

Modify the Draft AQMP

- Relax ozone controls
- Feasible control measures
- Cost-effective control requirements

FINAL REPORT
ECONOMIC IMPACTS OF THE DRAFT AIR QUALITY MANAGEMENT PLAN
PROPOSED BY
THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Prepared for
California Council for Environmental and Economic Balance

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David Harrison
Project Director

December 5, 1988

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EXECUTIVE SUMMARY

The South Coast Air Quality Management District (SCAQMD) issued a Draft Air Quality Management Plan (AQMP) for the South Coast Air Basin (Basin) in September 1988. The Basin consists of a 6,600 square mile area containing all of Orange County and the non-desert portions of Los Angeles, San Bernadino and Riverside counties. The Draft AQMP contains 160 individual control measures designed to improve air quality in the Basin and to meet the federal ambient air quality standards. The SCAQMD issued a Draft Environmental Impact Report (EIR) at the same time it issued the Draft AQMP.

This study estimates the economic impacts of the Draft AQMP. Our study takes as the starting point the information presented in the Draft EIR--although, as discussed below, we find the Draft EIR seriously deficient--and develops information on the costs, benefits and other impacts of the Draft AQMP. That information has led to several conclusions regarding the Draft AQMP.

Those conclusions are:

- The overall benefits of the Draft AQMP are much less than its overall costs. Using the underlying data and methodology relied upon by the SCAQMD, we estimate total costs to be \$14.8 billion per year and total benefits to be \$2.6 billion per year.
- The estimates of total benefits and total costs given in the Draft EIR do not appear to be reliable. The cost estimate of \$3.9 billion per year represents only a portion of the emissions reductions called for in the Draft AQMP. The benefit estimate of \$9.6 billion is not documented and could not be replicated.
- The \$14.8 billion in annual costs for the Draft AQMP is greater than the total sales tax revenues collected by the State of California. Control costs are similar to sales taxes in that most will ultimately

be borne by Basin households in the form of price increases for local goods and services, although a fraction--approximately 17 percent--will be borne by households outside the Basin. We estimate that the average Basin household will ultimately pay \$2,555 per year if the Draft AQMP were adopted, or \$51,100 as a lump sum payment. This cost increase represents the equivalent of tripling the general state sales tax for residents of the Basin.

- In addition to these monetary costs, certain measures in the Draft AQMP will lead to non-monetary costs--such as decreased labor productivity, less satisfactory commuting experiences, and decreased "quality of life"--that will increase the burden of the program on Basin residents.
- The Draft AQMP will also lead to indirect impacts on the health of Basin residents--including those resulting from reduced effective income--that may overwhelm the direct benefits of better air quality.
- The Basin will also suffer employment losses as a result of the Draft AQMP that will exceed the employment gains from control expenditures. We estimate that approximately 55,700 Basin jobs will be lost.
- The Draft AQMP will be particularly burdensome to the poor. We estimate that the percentage burden of costs is almost three times as great for households in the lowest income group than for households in the highest income group. Although control cost burdens represent 7 percent of income for upper income households, they represent 20.3 percent of income for the lowest income households.

- The poor are also likely to be disproportionately burdened by reduced employment opportunities in the Basin and by the indirect health impacts that follow from reduced income and increased unemployment.
- These overall benefit and cost comparisons mask an enormous diversity in the benefit-cost ratio for the various pollutants. The benefits of reducing ozone concentrations in the Basin--based on SCAQMD data and methodology--are only \$53 million per year, while the costs are \$11.1 billion per year. Thus, benefits are about one half of 1 percent of the costs for ozone. Even using an estimate of health benefits from another study--which would put Basin ozone benefits at \$314 million--the benefits would be less than 3 percent of the costs. In contrast, for particulates and sulfur oxides, benefits are \$2.5 billion and costs are \$3.8 billion, for a benefit-cost ratio of 0.7.
- Even apart from their benefits and costs, many of the individual control measures in the Draft AQMP appear to be infeasible, either because they depend upon large funding from other agencies or because they presume major technological advances in pollution control.
- The Draft AQMP could be modified to produce dramatic improvements in the benefit-cost ratio. Opportunities for improvement include relaxing controls on ozone precursors, focusing controls on the ozone precursors that appear to be most important in causing high ozone levels, focusing on the cheapest control sources, and relaxing standards for high-cost control sources. Some of these alternatives were identified in the Draft EIR, but were never evaluated.

- Although the U.S. Environmental Protection Agency sets ambient air quality standards, the SCAQMD has the responsibility to provide information on the public health benefits, costs, and feasibility of meeting those standards, and on the consequences of alternative policies. It does little good to produce a plan that shows "theoretical" attainment of the federal standards--disregarding the feasibility of control measures--or to identify alternatives without providing information on their costs and benefits.
- We recommend that the SCAQMD revise its Draft EIR to provide a more usable document and then modify the Draft AQMP to focus on feasible, cost-beneficial and cost-effective measures to improve air quality in the Basin.



**building industry association
of southern california, inc.**

December 14, 1988

Honorable Norton Younglove, Chairman of the Board
South Coast Air Quality Management District
9150 Flair Drive
El Monte, CA 91731

Honorable Donald Griffin, President
Southern California Association of Governments
600 So. Commonwealth Ave., Su. 1000
Los Angeles, CA 90005

SUBJECT: -REVIEW TIME FOR AQMP ALTERNATIVES
-BIA/SC PARTICIPATION ON DISTRICT'S AQMP TASK FORCES

Gentlemen:

The Building Industry Association of Southern California (BIA/SC) appreciates this opportunity to provide further comments on the Draft Air Quality Management Plan (AQMP). Over the past year we have worked with the South Coast Air Quality Management District (District), Southern California Association of Governments (SCAG), and numerous other organizations throughout the basin in developing our Association's responses to the AQMP. We appreciate the attitude of both the District and SCAG in helping to clean up our air basin while recognizing the need to preserve Southern California's economic future and quality of life.

The following comments address our concern that additional review time is needed for the recently introduced AQMP alternatives, and outline our desire to participate on the District's AQMP task forces.

REVIEW TIME FOR AQMP ALTERNATIVES.

As we have stated all along, BIA/SC supports the air quality goals expressed in the AQMP. We feel strongly that the plan submitted to EPA should include only those reasonably available measures, in the order of their cost-effectiveness, which will demonstrate attainment of all standards by the earliest achievable date.

BIA/SC is concerned that as a result of the AQMP's heavy emphasis on NOx reduction measures, the draft AQMP will require an 85 to 90 percent reduction in hydrocarbon emissions to attain the ozone standard. Many of the AQMP's hydrocarbon reduction measures rely

on technological breakthroughs and potentially unenforceable transportation control and land use measures. In contrast, we understand that the two alternative AQMPs proposed by the Western Oil and Gas Association (WOGA) and Southern California Edison (SCE) propose emission reduction measures which are based more on proven technology. At this point we have not had the opportunity to thoroughly review the alternate AQMPs.

The above issues are significant because if the AQMP's existing mitigation measures do not work, the District may be legally required to adopt and implement other more oppressive measures which could severely damage the economy. More specifically, we are concerned that when the AQMP is incorporated into the State Implementation Plan, it will become legally binding and enforceable even though a more cost effective approach is discovered. Therefore it appears crucial that the District adopt an AQMP which will attain clean air goals while creating the least disruption for Southern California's economy and residents. After all, if the District later decides that it is necessary to control NOx or other pollutant emissions to a greater degree to attain an air quality standard, it has the authority to do so even though those measures are not in the AQMP as initially adopted.

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Cont.

BIA/SC therefore strongly recommends that the SCAG Executive Committee and the District Board postpone adoption of the draft AQMP for 180 days or until their staffs can complete a comprehensive and objective evaluation of the alternative AQMPs. On the surface the alternative AQMPs may well attain the ozone standard and perhaps the PM-10 standards more expeditiously than the existing AQMP at approximately one-third the cost. Surely the residents of the air basin deserve adequate consideration of alternatives which could attain clean air more expeditiously and possibly save jobs.

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In light of the two AQMP alternatives, the District should also recognize the U.S. Environmental Protection Agency's (EPA) statement that they will prioritize mitigation measures that attain clean air faster. SCAG and the District should take the time to insure that the AQMP they adopt will attain the standard as quickly as possible with the most cost effective measures available. EPA is on record that if the AQMP is adopted as scheduled, it will be submitted two years ahead of the EPA's own schedule for preparation of its plan for attainment. In addition, a 180 day postponement to evaluate the two alternatives will not delay ongoing rule making. There is every good reason to postpone adoption.

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BIA/SC PARTICIPATION ON DISTRICT'S AQMP TASK FORCES.

We are enthusiastic about the opportunity to address the transportation, jobs/housing balance, and socio-economic impact issues which we understand the task forces will focus upon. In addition to Mr. Bart Doyle, our General Counsel, I would personally like to participate on the transportation and

jobs/housing balance task force. Mr. Rod Hanway, our Riverside County Region Executive Officer, has volunteered to participate on the socio-economic impact task force.

On May 3, 1988 I received a response (from Mr. Eugene Calafato) to my letter expressing interest in membership on the District's Advisory Council. While I am still very interested in membership on the Council, my participation on the proposed task forces will not allow me time for the Council as well. When the task forces are dissolved I will again have time available for the Council.

As indicated by our continuing involvement in the development of the AQMP, we look forward to helping clean up Southern California's air. BIA/SC is thankful for your consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Kenneth Willis".

Kenneth W. Willis
Executive Vice President

cc: Suzanne Reed
Eugene Calafato

Bryant Allen

EXECUTIVE SUMMARY OF COMMENTS, Requests for Changes
Final Regional Mobility Plan, December 15, 1988

I have labored at length to produce these comments. No matter how strong the inclination to dismiss them and rubber-stamp staff's recommendation, I believe they deserve positive action now, not months or years from now. I would not have bothered typing this if I did not think they merited the most serious attention. Thank you for being sensitive to this.

Page numbers refer to the October, 1988 draft of the RMP except where noted otherwise. Parenthesized comment numbers refer to the 15 pages of 44+ comments submitted earlier.

1. (C2) Please authorize staff to make editorial changes in the final, printed RMP so long as they do not change underlying intents. (I have submitted over 400 such changes.)

2. (C10, p. III-6, Local Streets and "Roads" subsection) Please authorize staff to include a bar chart(s), similar to those appearing in State Controller's reports on local road finance, or other graphic(s) which document the following for local roads in the SCAG region from FY 1972 to circa FY 1986:

- (a) the steady fall in road-user fees available or expended, especially the state's fuel-tax subvention, and
- (b) the steady rise in general-fund and other subsidies as a proportion of allocations or expenditures (for local roads).

Ideally, the figures used should be escalated according to the actual rise in prices for road construction and maintenance to date.

* 3. (C10, p. III-6, Local Streets and "Roads" subsection) Add language similar to this: "Also, the continuing real decline of the fuel-tax subventions for local roads has hurt local-government finance. General funds which today would likely be used for non-road purposes if the fuel-tax subventions had long ago been indexed to actual road costs are instead absorbed to shoulder the costs arising from motor-vehicle use."

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4. (C16A, new policy 33, chapter IV, shown on page 13 of staff's proposed revisions to the RMP). This policy urgently needs to be revised to read (optional wording parenthesized): "Additional local transportation user fees-(and transit funding sources) shall be supported to fund the programs of the adopted Regional Mobility Plan." Please be mute about other types of taxes.

5. (C16A, new policy 36, chptr. IV, p. 14 of staff's RMP revisions). Revise this policy to read: "Substantial increases in fuel-tax funding for local streets and highways shall be supported to reduce backlogged maintenance and improvement needs. Priority should be given to rehabilitating deteriorated facilities."

6. (C16A, 1st action on new page VI-13, old page VI-9). This action urgently needs to be revised to read "Support local fuel-tax, weight-fee and other user-charge initiatives in all metropolitan counties" and replace the (then redundant) first action on the preceding page with this revised action.

7. (C3, p. V-18, 3rd action). Replace the presently proposed action, recommending more subsidies for local roads, with:

Local Gov'ts,	Consider funding new and expanded	1989-
SCAG, Co. CTCs	local roads from direct or surrogate	2010
	road-user charges, and consider innovative	
	institutional arrangements to implement them	
	as alternatives to traditional and other re-	
	cent methods.	

Specific sample language explaining this was offered in the original comment and is incorporated by reference as an option.

8. (C3, p. V-18, 1st action). Revise the action to read: "Develop local support for additional state and/or local fuel-tax funding for local streets and highways sufficient to meet backlogged and accruing needs."

9. (C35, new policy 12, chptr. IV, p. 11 of staff's RMP revisions). Improve this policy to read: "The full range of costs of transportation improvements and alternatives shall be considered during their evaluation, including the costs of private automobile ownership and operation and including subsidies, both private and public and implied as well as overt."

10. (C37, new policy 31, chptr. IV, p. 13 of staff's RMP revisions). Revise this policy to read: "Primary reliance should be placed upon direct charges upon users to finance transportation projects."

11. (C38, new policy 32, ibidem). Revise this policy to read: "Increases in the State and/or local fuel taxes and weight fees and flexibility in their use shall be supported to fund implementation of the adopted Regional Mobility Plan and its identified programs."

12. (C39, new policy 34, ibidem). Revise this policy to read: "Additional road-user charges should be introduced to reduce traffic demand, especially during peak periods, including peak-period pricing and fuel-tax increases."

13. (C42, additional unnumbered policy, chptr. IV). Add a new policy: "Providing user-side subsidies targeted to poor and disadvantaged people should be considered as an alternative to subsidizing transportation for all of its users."

14. (CC22-24, p. V-6, Table V-1). Change "Measures" to "Approaches", add "Transportation User Fees" to the 1st TDM category's approaches, add "Road User Fees" to the 2nd, and clarify the very last approach as "Peak-Period Transportation User Fees".

15. (C25, p. V-6). Insert a new paragraph after the first, showing the tradeoffs between TDM by pricing and regulation: "In general, increasing reliance upon user charges to fund capacity expansion and roads generally while decreasing reliance upon subsidies, overt or implied, will decrease the need for the additional regulatory measures recommended in this element. Conversely, increasing funding for capacity expansion from sources which do not give users control over what they pay according to the amount and costs of their vehicle use will increase the need to implement these regulatory measures and, if they don't work, even tougher measures."

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Cont.



THE IRVINE COMPANY

December 14, 1988

Mr. Mark Pisano, Executive Director
Southern California Association of Governments
600 South Commonwealth, Suite 1000
Los Angeles, California 90005

Subject: Regional Growth Management Plan

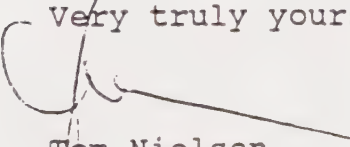
Dear Mr. Pisano:

We have reviewed the revisions to the Growth Management Plan and would like to indicate our support for the plan and the performance standard approach to achieving jobs/housing balance.

The revisions to the implementation program will allow local government to tailor jobs/housing strategies for local conditions to meet the goals of jobs/housing balance. We believe that this approach places the initial responsibility for air quality on local government and provides incentives to establish effective air quality measures as an integral part of the local land planning process. The challenge of meeting the air quality performance standards is now in the hands of local government. We as a landowner welcome the opportunity to work with local government to meet and hopefully exceed the standards. 198

The preparation of the Regional Growth Management and Mobility Plans by SCAG has been an enormous undertaking and you and your staff should be commended for a job well done. We appreciate the cooperative attitude and professional response we have consistently received from SCAG.

Very truly yours,


Tom Nielsen
Vice Chairman

THN/ah

cc: Harriett W. Far
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 and 1 m

To be included with the Sierra Club - Angeles Chapter letter of 12 Dec '88 on the G.M.P.
(omitted in error)

31 August 1988

A MESSAGE TO SIERRA CLUB CALIFORNIA ON GROWTH MANAGEMENT

WHY THIS MESSAGE?

We now have an opportunity, taking advantage of the present enthusiasm for growth control initiative, to encourage support for a long range approach which will lead to permanently improved life in and near our cities. We want to encourage greater and deeper thought among the chapters and groups of the Sierra Club about growth control initiatives, the planning process, the growth management concept, and how to get the most out of such initiatives. Their purposes can be sound, and usually are; but if not thought through and carefully worked out, especially as to legalities and procedures, the result may fall far short of the desired goal or may even be defeated. We hope consideration of these comments will lead to adoption of a Sierra Club California policy statement on growth control and growth management.

GROWTH CONTROL INITIATIVES

The current spate of anti-growth movements and their growing successes are wholesome and heartening to many of us environmentalists. Indeed, the 1985 Policy Statement on Urban Environments of the Joint California/Nevada Regional Conservation Committees urged the use of urban growth management techniques to control development. This message reinforces that support in the interest of regulating development as a permanent process rather than relying on one-shot initiatives. Further, extreme or defective measures may generate reactions negating the positive values gained from intelligent control. In fact, it would seem that some proposals have been defeated because the opponents claimed they were poorly drafted and unclearly worded. A moratorium initiative is appropriate to allow creation of a plan and the regulations needed for growth management to be effective; but generally, a sound system of control is not established by just one initiative.

In a few instances where little change is required, a simple zoning amendment (e.g. Proposition U in Los Angeles reducing certain commercial building heights and bulk) is appropriate. But continued citizen vigilance is essential to ensure effective enforcement and prevent weakening amendments and improper variances. Mostly, what is needed is a program relating growth to the capacity for all public services. Los Angeles' new limits on new land development under an EPA directive, pending expansion of sewage treatment capacity, is a temporary, limited form of growth management. Decisions as to priority of development proposals thus become important but stopgap actions to meet a crisis in a single service. But with a change in public, and of course, official attitudes, it could become the start of a rational method to manage all growth.

An initiative can lay the groundwork and provide the first steps in the development of a growth management system but follow-up is essential thereafter, particularly in terms of appropriations for maintenance and operation of the system. Hence if passage of the original legislation does not engender support for a continuing effort, it might just as well not be started at all.

Santa Cruz County Supervisor Gary Patton said in discussing growth control, "the 'growth is inevitable' approach doesn't work--or maybe

it's better to say that that approach simply abandons the ship of community choice. It's a decision not to decide what we want...Let's try the approach of determining, as a community, what we would like to see happen--and then try to achieve what we want...It's not a defeatist approach. It's an optimistic approach. It suggests that we really can, as a community, make real choices about our future...Unless we do try to achieve what we want, we'll never be successful." This is how growth management is defined, a way to achieve what we want, a deliberate and rational process building on a rational community plan.

THE GROWTH MANAGEMENT PROCESS

Growth management involves a major change in public and governmental attitudes from current laissez-faire, "development is always good" approaches.

As a reasonable procedure for considering each proposed development on its merits, growth management requires that there be, or be enacted:

1. A viable comprehensive plan setting forth accepted community goals and policies, including protection of open spaces for both public health and resource protection needs.
2. A satisfactory zoning ordinance based on the plan, setting desired density and other limits.
3. Standards for sound land subdivision and livable developments.
4. A well thought out capital improvement program for the needed expansion of services, balancing a) improvement of existing facilities with provision of new ones and b) public and private investment in those improvements in an equitable manner.

Thus, growth management plans indicate how, where and when urban expansion may occur in concert with the installation of needed infrastructure. It does not attempt to stop all development, but is the means for guiding the process of development to serve citizens' needs as provided by the cities, counties and special districts.

IMPLEMENTATION TWO APPROACHES

There are two major methods of implementation: 1) designating specific areas ready for new construction; 2) specifying the number of units to be built in any one year and rating each proposal under a system of pre-established point values as to its meeting or exceeding the established standards and needs. This is the way Petaluma set up the first growth management system in California.

Approach No. 1 is usually based on identifying previously installed services which can take care of new growth with little or no public expenditure. The development of unserved areas mandates thoughtfully set priorities with solid reasons for the choice of areas to be developed first. These might be such matters as open space protection, relative costs of utility extensions, transit accessibility to the community center, redevelopment opportunities, willingness of owners to fund needed improvements, etc.

The second approach usually calls for a once-a-year review in which each proposal is evaluated. This can result in a one-time allocation of permits to build an entire project, but more likely, it would allow large projects to be phased over a much longer period. The number of units allowed per year would be set according to the ability to finance all the needed improvements, using both public and private

funds. Other, rather lesser, considerations would also enter into the decisions.

Any effective growth management system requires knowledgeable and reliable people to administer it and a fixed, fair set of procedures and policies so that developers feel they are being treated honestly. Also very essential is continuous citizen involvement and oversight to insure that limitations are observed as specified in the general plan and other policy statements and that the system is not subverted.

IMPORTANCE OF A METROPOLITAN APPROACH

The preceding paragraphs relate to any effort at growth control at local levels. But to be really effective and meaningful, it should be implemented at a regional, metropolitan or even state level, something never before tried in California. When a city limits its own growth severely, areas outside its borders will be impacted by developers seeking to tap the same market. Unless all those communities take parallel self-defensive actions, they will grow much faster and suffer similar difficulties in finances, traffic and school congestion, etc. In turn, traffic congestion can increase in the growth-controlled because of the longer commutes and lack of areawide public transportation; utility and sewer loads may also increase there due to the outer growth. It is better to rationalize the whole process from the start through a regional growth plan, programming for the entire demand in an orderly way. This is the kind of thinking behind the current and very commendable Oregon planning system. It should be emulated, at least in concept in California. The actual system, of course, must be adapted to our state's patterns and legal requirements.

In Oregon a state review body was established which first drafted a complete set of policies and criteria to guide local and metropolitan planning. These were reviewed by all interested parties, including cities and counties, and then modified and adopted by the state agency. The second step required each city, county and metropolitan agency to prepare or change its own development plan, including an urban limits boundary beyond which intensive development could not go; state review and consent was required before local adoption. This procedure parallels that set up for implementing California's Tanner Act (AB 2948 - Chap 1167, Statutes of 1986) requiring state, local and regional hazardous waste planning. The state now has its guidelines; local and regional plans have been or are being drafted; some units are now seeking municipal and state approval. Thus the Oregon procedure would be familiar to Californians and the pertinent issues could be determined, discussed and decided, with hopefully a minimum of confusion. The development of a statewide growth planning and management program is possible; it will, no doubt, require many voluntary efforts at regional control before a state system is accepted.

AIDES AND PRECAUTIONS

A valuable manual, "Using Initiatives and Referenda to Protect Open Space", was published in 1983 by People for Open Space in San Francisco and updated in 1986. A more comprehensive study, "Trends in Local Growth Control Ballot Measures in California", published in the UCLA Journal of Environmental Law and Policy (Vol 6, No 2, 1986) has been reprinted as a pamphlet. Both have some wise and useful conclusions and suggestions about such efforts. They point out that far-reaching

regulations will be accepted as long as landowners are able to make some economic use of their property, and that open space is better protected by zoning it for such categories as agriculture than for large-lot residences. Provision for a fair-share distribution of low and moderate income housing is essential; and so is maintaining a detailed administrative record of the effort to secure passage of the proposal, every step of the way.

AFFORDABLE HOUSING

The fair-share low and moderate income (affordable) housing program is vital to successful growth management initiatives, if for no other reason than that opponents will seek to invalidate them by claiming the controls will not permit housing the poor. In fact, in this time of increasing average income, the average cost of houses has been rising much faster, and blame will be laid at the door of slow growth. We may be potentially contributing to the general shortage of housing with demands for high standards of design and for protecting open space and coastal areas. We can answer this by willingness to help supply the most serious part of the demand, the need for affordable housing. It is, in a sense, the opposite side of the growth management coin; the poor and homeless should not have to suffer from our actions. Upper income people have fended for themselves, and can well afford to, although grumbling at the higher cost. They are the ones who buy the bigger houses on the bigger lots, further and further away from jobs and business centers, constituting a major part of the growth problem. Growth control is our response to them, but there must be an effective answer supplying the needs of the poor and homeless, too.

There is, but it is complicated and involves many actors. It is a field in which the Club has had little or no experience, and perhaps, should rely on others for guidance. But we believe it is essential to be part of the solution, not the problem. Other than saying that, this paper can go no further. It needs to be the subject of another "message".

COOPERATION

Finally, we feel strongly that Sierra Club California should vigorously support efforts to bring together the three major interests: environmentalists and residents seeking growth control, developers seeking to supply the housing market, and public officials, to find common ground where the conflicts can be resolved in a workable and meaningful way. The Angeles Chapter made a start in sending some of its activists to the conference held by UCLA Extension last June, called "Searching for Common Ground". Growth management, we believe, can provide it.

Stephan A Kaufman, Chairman
SC/NRCC Land Use Committee

6MP + RMP
ITEM 5B + 5F

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1

FORUM DATE AND LOCATION 12-15-88 TIME RECEIVED 10:07 AM

NAME Robert Petermaster PHONE _____

ADDRESS City of Long Beach

IF YOU ARE REPRESENTING AN ORGANIZATION, PLEASE LIST:

NAME _____ PHONE _____

ADDRESS _____



600 So. Commonwealth Ave., Suite 1000
Los Angeles, California 90005

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FORUM DATE AND LOCATION _____ TIME RECEIVED _____

NAME STANLEY HART PHONE (818) 791-9349

ADDRESS 3104 MOUNT CURVE Ave., ALTADENA

IF YOU ARE REPRESENTING AN ORGANIZATION, PLEASE LIST:

NAME SIERRA CLUB PHONE (213) 387-4287

ADDRESS 3550 WEST SIXTH ST. LA., CA 9

REGIONAL MOBILITY PLAN



600 So. Commonwealth Ave., Suite 1000
Los Angeles, California 90005

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FORUM DATE AND LOCATION _____ TIME RECEIVED _____

NAME Robert Getts PHONE _____

ADDRESS Will address AGMP

IF YOU ARE REPRESENTING AN ORGANIZATION, PLEASE LIST:

NAME Western Oil and Gas Association PHONE (818) 545-4105

ADDRESS 505 N. Brand Blvd. Glendale, CA 91203



600 So. Commonwealth Ave., Suite 1000
Los Angeles, California 90005

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NAME Ray Berner PHONE 629-0625

ADDRESS 11th

IF YOU ARE REPRESENTING AN ORGANIZATION, PLEASE LIST:

NAME LA Area Chamber of Commerce PHONE _____

ADDRESS _____



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Los Angeles, California 90005

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FORUM DATE AND LOCATION 12/15 SCAG TIME RECEIVED _____

NAME DR. MICHAEL HERTEL PHONE _____

ADDRESS _____

IF YOU ARE REPRESENTING AN ORGANIZATION, PLEASE LIST:

NAME SOUTHERN CALIFORNIA EDISON PHONE 302-4444

ADDRESS _____



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Los Angeles, California 90005

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FORUM DATE AND LOCATION _____ TIME RECEIVED _____

NAME RONALD BATES & BOB DUVEK PHONE _____

ADDRESS ORANGE COUNTY DIVISION LEAGUE OF CALIF CITIES

IF YOU ARE REPRESENTING AN ORGANIZATION, PLEASE LIST:

NAME _____ PHONE _____

ADDRESS _____



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Los Angeles, California 90005

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CALL TO AC
4 Plan

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NAME MARC FUTTERMAN, LA/AIA PHONE 933 8341

ADDRESS 6100 WILSHIRE BLVD, LA, CA 90048

IF YOU ARE REPRESENTING AN ORGANIZATION, PLEASE LIST:

NAME LOS ANGELES AMERICAN INSTITUTE OF ARCHITECTS PHONE 659-2284

ADDRESS PACIFIC DESIGN CENTER, W. HOLLYWOOD, CA



600 So. Commonwealth Ave., Suite 1000

3-246

56

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FORUM DATE AND LOCATION _____ TIME RECEIVED _____
NAME David S. Cahn PHONE 213/258-2777
ADDRESS P.O. Box 2950 TA, Los Angeles 90051

IF YOU ARE REPRESENTING AN ORGANIZATION, PLEASE LIST:

NAME Southern California Air Quality Alliance of CMAA PHONE 916/441-5420
ADDRESS P.O. Box 1198, Sacramento 95812-1198



600 So. Commonwealth Ave., Suite 1000
Los Angeles, California 90005

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FORUM DATE AND LOCATION _____ TIME RECEIVED _____
NAME STEPHEN L. RAUFMAN PHONE 714/24-1522
ADDRESS 211 W. Harrison Ave. Orem UT 84057

IF YOU ARE REPRESENTING AN ORGANIZATION, PLEASE LIST:

NAME Sierra Club PHONE _____
ADDRESS _____



600 So. Commonwealth Ave., Suite 1000
Los Angeles, California 90005

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FORUM DATE AND LOCATION SCAG OFFICE TIME RECEIVED 10:00
NAME Beth Leeds PHONE 714 497 8968
ADDRESS 1645 Arroyo Dr. Laguna Beach Ca
IF YOU ARE REPRESENTING AN ORGANIZATION, PLEASE LIST:
NAME Environmental Protection Consultants
ADDRESS same



600 So. Commonwealth Ave., Suite 1000
Los Angeles, California 90005

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FORUM DATE AND LOCATION 12-15-88 SCAG TIME RECEIVED _____
NAME CAROLYN WOOD PHONE 714 497-1884
ADDRESS 2755 Temple Hills Dr. Laguna Beach, 92651

IF YOU ARE REPRESENTING AN ORGANIZATION, PLEASE LIST:

NAME _____ PHONE _____
ADDRESS _____



600 So. Commonwealth Ave., Suite 1000
Los Angeles, California 90005

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NAME MARIELLE LEEDS PHONE 497-4531
ADDRESS 2775 LAGUNA CANYON ROAD, LAGUNA BEACH

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56

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FORUM DATE AND LOCATION 12/15/88, SCAG TIME RECEIVED _____
NAME Edric Guise PHONE 213-250-8965
ADDRESS 1571 Beverly Blvd., L.A.
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NAME BIA of So. Cal. PHONE see above
ADDRESS see above



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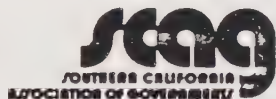
NAME Bryan Allen PHONE 213-254-8298

ADDRESS 3142 Drew St. LA, CA 90065-2305

IF YOU ARE REPRESENTING AN ORGANIZATION, PLEASE LIST:

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FORUM DATE AND LOCATION _____ TIME RECEIVED _____
NAME SAT TAMARIBUCHI PHONE 714-720-2371
ADDRESS _____

IF YOU ARE REPRESENTING AN ORGANIZATION, PLEASE LIST:

NAME THE IRVINE COMPANY PHONE _____
ADDRESS 550 NWPT CTR. DR. , NWPT Bch., CA



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Los Angeles, California 90005

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FORUM DATE AND LOCATION Thursday, Dec. 15, 1988 TIME RECEIVED _____

NAME David Harrison PHONE _____

ADDRESS _____

IF YOU ARE REPRESENTING AN ORGANIZATION, PLEASE LIST:

NAME National Economic Research Associates, Inc. PHONE _____

ADDRESS 555 South Flower St., Suite 4100, Los Angeles 90071



600 So. Commonwealth Ave., Suite 1000
Los Angeles, California 90005

PUBLIC MEETING

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FORUM DATE AND LOCATION Thursday, Dec. 15, 1988 TIME RECEIVED _____

NAME Evelyn Heidelberg PHONE 916-442-5199

ADDRESS 1149 Fremont Way, Sacramento 95818

IF YOU ARE REPRESENTING AN ORGANIZATION, PLEASE LIST:

NAME CALIF. Council for Environmental and Economic Balance
PHONE _____

ADDRESS 1512 14th St. Sacramento 95814



600 So. Commonwealth Ave., Suite 1000
Los Angeles, California 90005

RESPONSES TO THE ORAL TESTIMONY RECEIVED AT THE
PUBLIC HEARING ON DECEMBER 15, 1988

157. Refer to Response 1.
158. This comment is related to the AQMP and is responded to in the AQMP/AQMP FEIR.
159. This comment is related to the AQMP and is responded to in the AQMP/AQMP FEIR.
160. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
161. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
162. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
163. The analysis of socioeconomic impacts is not required by CEQA. See Response 34.
164. See Response 1.
- 165a. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
- 165b. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
- 165c. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
- 165d. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
- 165e. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
166. This comment is not related to the adequacy of the DEIR. No response is required. The approval process for adoption of SCAG's plans is a policy decision that will be made by the Executive Committee.
167. See Response 34.
168. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
169. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.

170. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
171. ? EIR or GMP comment ?
172. This comment is related to the AQMP and is responded to in the AQMP/AQMP FEIR.
173. This comment is related to the AQMP and is responded to in the AQMP/AQMP FEIR.
174. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
175. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
176. This comment is related to the AQMP and is responded to in the AQMP/AQMP FEIR.
177. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
178. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
179. See Response 34.
180. See Response 1.
181. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
182. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
183. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
184. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
185. This comment is related to the AQMP and is responded to in the AQMP/AQMP FEIR.
186. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
187. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
188. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.

189. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.
190. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
191. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
192. This comment is related to the AQMP and is responded to in the AQMP/AQMP FEIR.
193. This comment is related to the AQMP and is responded to in the AQMP/AQMP FEIR.
194. This comment is related to the AQMP and is responded to in the AQMP/AQMP FEIR.
195. This comment is related to the AQMP and is responded to in the AQMP/AQMP FEIR.
196. This comment is related to the AQMP and is responded to in the AQMP/AQMP FEIR.
197. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
198. This comment is related to the merits of the Draft GMP and is responded to in Appendix I of this report.

CHAPTER 4. ERRATA

This chapter shows all changes to the DEIR with the exception of Table 3-1, which is shown in Chapter 2. Text in standard print is original text from the DEIR; text in italics is added language; text that has been overstruck is deleted language. The chapters are ordered as they appear in the DEIR. References to paragraphs refer to complete paragraphs, unless otherwise noted.

Page 2-2

On Figure 2-2, replace the words "Chino Basin" with "West San Bernardino Valley."

Page 3-6

Amend the sixth paragraph, third line, as follows:

". . . of natural habitat and endangered species. Other nonrenewable resources, such as water, would also be committed to use."

Page 4-3

Amend the fourth column header of Table 4-1 as follows:

"Increase, 1984 1980-2010"

Page 4-4

Add the following language to the first paragraph, sixth line:

". . . Association of Governments 1988h). From 1984 to 1988, the number of housing units increased by approximately 430,000 (2.3 percent per year), growing to 5.08 million."

Add the following language to the third paragraph, seventh line:

". . . Association of Governments 1987). From 1984 to 1988, however, household size in the region increased from 2.66 to 2.70."

Page 4-9

Add the following language to the fourth paragraph, fifth line:

". . . estimate prepared by SCAG). DOF's projection was derived by converging ethnic fertility rates to the White fertility rate by 2010. SCAG projections. . . ."

Page 4-11

Amend the sixth paragraph, first line, as follows:

"~~Ninety-five~~ *Approximately eighty* percent of all additional households. . . ."

Page 4-18

Amend the second header as follows:

"Impact: ~~Continuing~~ Increased Jobs/Housing Imbalance over 1984 Among Subregions and Counties"

Page 4-19

Amend the first paragraph, second line, as follows:

". . . with the exception of *Orange and Los Angeles and Imperial* Counties. . . ."

Amend the second paragraph, fourth line, as follows:

". . . (moving 25 percent further from the *1984* regional average in *2010*)."

Amend the fourth paragraph, second line, as follows:

"~~. . . subareas relative to 1984, a J/H imbalance would still exist in 2010~~ *the imbalance would increase regionwide relative to 1984. This conclusion is based on weighting the figures in Table 2-10 ("Change in Jobs/Housing Ratios, 1984-2010, as a Percentage of the Change Required to Achieve the 2010 Regional Jobs/Housing Ratio") by the average of employment and housing growth. Because Los Angeles and Orange Counties and the urbanized subregion are projected to experience the greatest amount of employment and housing growth, their negative effect on J/H ratios weighs more heavily. Therefore,*
~~the effects of a J/H imbalance,--such as increased commuting distances and traffic congestion,--degraded air quality,--increased energy consumption,--and--reduced--close-in--employment--opportunities.~~
This impact. . . ."

Page 4-24

Amend the third paragraph, first line, as follows:

~~"For the purposes of this analysis,--it is assumed that the~~ *The* ethnic and age distribution of the region's population in 2010 under GMA-Low would be the ~~same as~~ *similar to* the forecast by SCAG for GMA-1. . . ."

Page 5-3

Amend the second bullet, first line, as follows:

"o Local jurisdictions should ~~limit~~ *consider limiting* the extent and. . . ."

Page 6-1

Amend the third paragraph, second line, by adding the following after the first sentence:

"For the entire region, dependable supplies were estimated to exceed total average demand by 0.42 MAF (6 percent) in 1984, as indicated in Table 6-1."

Amend the fourth paragraph, third line, as follows:

". . .by-2000 slightly over time as water use in areas of origin in northern California increases- and Central Valley Project (CVP) contractual obligations increase. ;--and--users--with--prior--rights--to northern-California-water-supplies-exercise-those-rights (Southern California Association of Governments 1987; Soltz pers. comm.)."

Page 6-2

Amend the first paragraph, fourth line, as follows:

"The Metropolitan Water District of Southern California's (MWD's) annual ~~apportionment~~ dependable supply of Colorado River water would be reduced by approximately 620,000-million-acre-feet-(MAF) (55-percent)-from-1.21-MAF-TO-0.55-MAF 690,000 acre-feet (AF) (59 percent) from 1.16 MAF to 0.47 MAF as a result of the CAP and increased water use by upper Colorado River basin states. Annual ~~apportionments to the Imperial Irrigation District, Coachella Valley Water District, and Palo Verde Irrigation District, which currently total 300,000 AF, would be eliminated by operation of the CAP.~~ Based on historic diversions of Colorado River water, the Coachella Valley Water District's loss in dependable supplies could be as much as 238,000 AF per year (California Department of Water Resources 1987; Soltz pers. comm.)."

Amend the second paragraph, first line, as follows:

"State Water Project. If additional water supplies are not secured, SWP contractors in the region will face increasing risks of water supply deficiencies during dry years. ~~Of-the-1.86-MAF-in maximum-SWP-entitlements-held-by-contractors-in-the-MWD-service area-for-1988,-a-total-of-1.08-MAF-in-approved-orders-were-processed (58-percent-of-maximum-entitlements)-due-to-facilities-constraints. Maximum-entitlements-to-these-contractors-are-scheduled-to-increase-to 2.0115-MAF-per-year-in-1990-(Horne-pers.-comm.-). The total maximum SWP entitlements held by contractors south of the Tehachapis for~~

1988 was 2.213 MAF, including 1.86 MAF for the MWD. In 1988, all contractors south of the Tehachapis requested 1.188 MAF, including 1.03 MAF for the MWD. All requests were approved. Until the East Branch of the California Aqueduct is enlarged in 1992, the MWD can only import about 1.4 MAF from the SWP; however, the MWD's maximum annual entitlement will increase to 2.0115 MAF in 1990 (Soltz pers. comm.)."

Amend the third paragraph, fifth line, as follows:

"Statewide estimates indicate that annual net ~~use of~~ firm SWP supplies will increase by 800,000 AF (33 percent) from 1985 to 2010, increasing from 2.4 MAF to 3.2 MAF. The SWP would not be able to meet ~~this~~ the increased demand of 3.6 MAF in 2010 in most years with existing facilities, but could do so in approximately 4 of every 5 years, assuming that existing facilities are ~~expanded~~ augmented as planned (California Department of Water Resources 1987; Soltz pers. comm.)."

Amend the fifth paragraph, first line, as follows:

"*Colorado River*. Because of an increase in the use of entitlements by users in Arizona, the dependable supply of Colorado River water allocated to the MWD has been reduced from ~~1.212~~ 1.16 MAF to ~~0.55~~ 0.47 MAF per year ~~and is conservatively projected at 0.47 MAF per year by MWD staff after deductions for rights held by others and system losses~~ (Chan and Soltz pers. comms.). The Imperial Irrigation District, ~~Palos--Verdes~~ Palo Verde Irrigation District, and Coachella Valley Water District hold priority to the first 3.85 MAF of California's 4.4 MAF apportionment of Colorado River water. Strategies for ~~transferring the more efficient~~ use of these supplies from ~~agricultural to urban uses~~ are currently being investigated by the MWD."

Page 6-3

Amend the second paragraph, fifth line, as follows:

"About one-third of the water used in that year was derived from groundwater and surface supplies ~~and local sources~~; the remainder was imported from the Colorado River (through the Colorado River Aqueduct), ~~through the SWP~~ northern California, and the Owens/Mono basins (through the Los Angeles Aqueducts)."

Page 6-4

Table 6-1 should be amended as follows:

Table 6-1. Regional and Subregional Water Supply and Demand Projections in 1984 and 2010
and Under the Proposed Project and Alternatives (2010)

	REGIONAL TOTAL (1984)	REGIONAL TOTAL (2010)	PLAIN SUBREGION (2010)	OUTLYING SUBREGION (2010)
Dependable Supplies (MAF per year)	9.1 7.48	8.3 6.27	3.5 2.60	4.8 4.12
Demand (MAF per year)				
Urban	3.3 3.03	4.9 3.98	3.9 3.07	1.0 0.91
Agriculture	4.7 4.02	4.6 3.94	0.4 0.23	4.2 3.71
Total	8.0 7.06	9.5 7.92	4.3 3.30	5.2 4.62
Projected Surplus (Shortfall) (MAF per year)	1.1 0.42	(1.20)	0.80 (0.70)	0.40 (0.50)
Projected Surplus (Shortfall) as Percentage of Total Demand	13.8 5.95	(12.6) (15.15)	(18.6) (21.2)	(7.7) (10.8)

Sources: ~~Southern California Association of Governments (1987)~~; ~~Soltz~~ Froelich pers. comm.

Note: Data is based primarily on information from Water Supplies for the Southern California SWP Service Area - Phase I (June 1987) and SCAG Baseline growth projections (1987).

Amend the first paragraph as follows:

"The population of the MWD service area has increased from 7.4 million in 1960 to ~~13.6 more than 14~~ million in 1986, which represents approximately half of the state's population (State Water Contractors 1987a, Southern California Association of Governments 1987, *Soltz pers. comm.*)."

Amend the second paragraph, first line, as follows:

"The MWD's dependable or firm supply is estimated to be ~~MWD holds rights to approximately~~ approximately 3.37 MAF per year of ~~dependable of firm supply,~~ including 1.19 MAF from local sources, 1.14 MAF from the SWP, 0.47 MAF from the Colorado River, 0.42 MAF from the Los Angeles Aqueducts, and 0.15 from wastewater reuse (Chan pers. comm.). Firm or dependable yield is the annual supply expected to be available during periods of below-average precipitation, in accordance with a predetermined schedule of probability. ~~Dependable supplies were estimated to exceed total average demand by 0.42 MAF (6 percent) in 1984, as indicated in Table 6-1.~~"

Amend the fourth paragraph, first line, as follows:

"*Other Providers.* Other major water providers include the Imperial Irrigation District, the Coachella Valley Water District, and the ~~Palo Verde Palos Verdes~~ Irrigation District."

Amend the fifth paragraph, third line, as follows:

"Imported supply options include storage of water from existing sources *during wet periods*, use or storage of surplus water from *unused entitlements of Colorado River Water from other lower Colorado River basin states* ~~other states or~~ and agricultural agencies, and predelivery of exchange water to *water agencies in the Coachella Valley irrigation districts.*"

Amend the sixth paragraph, first line, as follows:

"The MWD *is considering storage* ~~has proposed storage of up to 3.0 MAF of surplus water. . . .~~"

Amend the third paragraph, first line, as follows:

"*Surface water sources.* ~~Improper~~ Operation. . . ."

Page 6-9

Amend the sixth paragraph, first line, as follows:

"Impact: Regional Water Supply Shortfall of 1.2 *Million Acre-Feet* in 2010"

Amend the sixth paragraph by adding the following:

"However, studies indicate that a projected decline in residential per capita water use may be offset by an increase in commercial use rates (Soltz pers. comm.)."

Page 6-10

Amend the first paragraph, third line, as follows:

". . . would increase regional water use by approximately 1.5 0-86 MAF (18.8 12-2 percent) between 1984 and 2010. Urban demand would increase by 1.6 0-95 MAF (48.5 31-7 percent) and agricultural demand would decrease by 0.1 MAF (2.1 2-0 percent). ~~By 2010, A Agriculture and urban uses~~ within the region would demand approximately 48 percent ~~or regional water consumption in 2010, compared to 59 percent in 1984 the same amount of water.~~ Approximately 55 58 percent of regional water demand in 2010 would come from the outlying subregion, based largely on agricultural water use (Froelich pers. comm. ~~Southern California Association of Governments-1987~~)."

Amend the third paragraph, first line, as follows:

"Urban water demand in the MWD service area is projected by MWD DWR. . . ."

Amend the fourth paragraph, first line, as follows:

"During this period, dependable supplies for the SCAG region are expected to decline by 0.8 0-76 MAF (8.8 10-2 percent). These trends would result in a projected shortfall of 1.20 MAF in 2010, with supplies meeting less than 88 85 percent of total demand in that year. . ."

Amend the fifth paragraph, third line, as follows:

". . . where dependable supplies would total 3.5 2-60 MAF (81.4 78-8 percent) of projected demand. Supplies would be expected to meet 92.3 89-2 percent of the demand in outlying areas."

Page 6-11

Amend the second line as follows:

". . . within the MWD service area, *including San Diego County* (Chan pers. comm.)."

Amend the fourth paragraph as follows:

"The wastewater volume handled by all treatment plants in the region in 1985, 1,660.5 million gallons per day (MGD), represented 87 percent of the estimated collective capacity of those plants. Since ~~peak flows exceed average daily wastewater flows (ADWF) by as much as 25 percent, plants operating at 75 percent capacity often are considered in need of expansion (Southern California Association of Governments 1987).~~ In 1985, ADWF comprised 73 percent of countywide wastewater capacity in Riverside and San Bernardino Counties, 79 percent in Ventura and Imperial Counties, and 90 percent in Los Angeles and Orange Counties (Southern California Association of Governments 1987)."

Amend the fifth paragraph, third line, as follows:

"Table 6-2 identifies districts handling ADWFs in excess of 75-percent capacity. Some of these districts have plans to expand their wastewater treatment facilities, while districts not listed could also experience future shortfalls if they undergo very high levels of growth (Southern California Association of Governments 1987). *It should be noted that some plants operating at or above full capacity are not in need of expansion, since regional wastewater systems (including two such systems operated by the County Sanitation Districts of Los Angeles County) allow flows to bypass some plants and be treated at others (Gratteau pers. comm.).*"

Add the following paragraph after the fifth paragraph:

"Conditions in respective wastewater districts within the region are expected to change, based on projected growth and planned facility capacity expansions in various districts. For the year ending September 1988, for example, ADWF at the San Jose Creek WRP in Los Angeles County was 102 percent of ADWF plant capacity, compared to 82 percent as of 1985; however, the capacity of this plant would increase 60 percent by 1991 based on an expansion proposed by the County Sanitation Districts of Los Angeles County (Gratteau pers. comm.)."

Amend the fourth paragraph as follows:

"As more and more wastewater effluent is generated and enters receiving waters, the level of treatment becomes increasingly important for maintaining water quality. Three larger districts in Los Angeles and Orange Counties discharge into the Pacific Ocean and do not provide full secondary treatment ~~;- the minimum level of treatment required by law.~~ The County Sanitation Districts of Los Angeles County are currently awaiting a decision on their request for an Ocean Discharge Waiver under Section 301(h) of the Federal Clean Water Act. If this is denied, the Districts will be required to expand secondary treatment facilities to match primary treatment capacity without decreasing overall wastewater treatment capacity (Gratteau pers. comm.)."

Amend the third paragraph, third line as follows:

" . . .dependable annual supplies at a regional level by 2010 to ~~at least approximately 10 8-0~~ MAF. . ."

Amend the third paragraph, fifth line, as follows:

"- increase SWP yields through implementation of a Coordinated Operation Agreement between the State and the U. S. Bureau of Reclamation; completion of various Delta facility capacity improvements (including completion of Delta Pumping Plant, South Delta improvements, North Delta improvements, ~~West North Delta water management, and Delta levee improvements,~~ offstream storage programs (including Kern Water Bank, Los Banos Grandes Reservoir, ~~Kellogg/Los Vaqueros Reservoirs,~~ and Delta island reservoir storage), CVP programs (including interim water supply acquisition and New Melones Reservoir conjunctive-use program), and other SWP programs (including Cachuma Reservoir enlargement); and implementation of water transfer agreements ~~between agricultural and urban SWP contractors.~~
 . . ."

"- ~~participate in programs to store~~ ~~store up to 3.0 MAF of~~ surplus water in groundwater basins. . . ."

Page 6-21

Amend the first bullet, first line, as follows:

"o The ~~1974~~ 1979 Areawide Waste Treatment. . . ."

Amend the second bullet, third line, as follows:

" . . . entities ~~should~~ *may need to* upgrade their facilities. . . ."

Page 6-25

Amend the first paragraph, third line, as follows:

"However, these alternatives are in only limited use in the region today because of or are otherwise constrained by cost, market uncertainties concerning the sale of recyclable materials, the current energy surplus, and air quality concerns associated with the production of energy from solid waste, ~~and lack of public and political support for such measures (Southern California Association of Governments 1987; Gratteau pers. comm.).~~"

Amend the second paragraph, third line, as follows:

"The shortage of landfill capacity is most acute in urban areas, particularly in Los Angeles County and the valley area of the San Bernardino County, where waste quantities are greatest and where suitable sites for new or expanded landfill sites are most difficult to find. *County Sanitation Districts of Los Angeles County staff report that Los Angeles County will begin to experience a daily shortfall in landfill capacity by 1992 if no expansions, development of new sites, or increased recycling are implemented (Gratteau pers. comm.).* ~~Virtually all of Los Angeles County's permitted landfill capacity for residential and commercial waste could be depleted by the end of 1991 without increase in landfill capacity, according to a 1988 study by the Los Angeles County Sanitation Districts and the City and County of Los Angeles.~~ The five landfills in the valley of San Bernardino County would be depleted by 1994 (Southern California Association of Governments 1988e)."

Amend the fourth paragraph, first line, as follows:

"Regional annual solid waste disposal demand would increase from 19.94 million tons in 1984 to 27.73-32.46 ~~29.36-29.50~~ million tons in 2010. . . ."

Add the following after the fifth paragraph:

"Based on 1988 Ventura County landfill capacity estimates and 1987 solid waste disposal data prepared by the CWMB, the remaining useful life of existing Ventura County landfills is projected to be 3.0-3.5 years, compared to 4.5 years as indicated in Table 6-6. However, several projects under consideration could increase the useful life of county landfills to 17-18 years. These projects include reactivation of the Ballard landfill, expansion of the Simi Valley landfill, and development of a new Weldon Canyon landfill in western Ventura County (Madden pers. comm.)."

Page 6-28

Amend the fourth paragraph, first line, as follows:

- "o A comprehensive regional solid waste management plan should be developed and implemented by counties within the region, and this plan should include waste reduction, reuse, and recycling programs."

Page 6-33

Amend the fifth paragraph, first line, as follows:

- "o The Southern California Hazardous Waste Management Authority and each of its member counties should adopt and implement hazardous waste management plans that include waste reduction programs ~~the 1989 Regional Hazardous Waste Management Plan.~~"

Page 6-37

Amend the third paragraph, first line, as follows:

"Impact: Demand for Approximately 677. . . ."

Page 6-39

Amend the third item beneath the bullet, first line, as follows:

"- build ~~at-least~~ *approximately* 677 new schools. . . ."

Page 6-43

Amend the first paragraph, first line, as follows:

"Impact: Need for ~~at-least~~ *approximately* 11,430. . . ."

Page 6-46

Amend the third paragraph, first line, as follows:

"Impact: need for ~~at-least~~ *approximately* 7,100-10,970. . . ."

Page 6-56

Amend the third paragraph, fifth line, as follows:

"Regional demand was estimated based on household and employee generation rates (*California Energy Commission 1987a* ~~Southern California Association of Governments-1982~~)."

Amend the fourth paragraph, sixth line, as follows:

"Remaining households are served by the San Diego Gas and Electric Company (SDGE) ~~or~~ the Imperial Irrigation District (IID) ~~and other providers, including municipal electric utilities (e.g., Anaheim, Riverside, and Colton) and independent power producers such as cogenerators (that are being relied upon increasingly to meet future energy supply demand).~~"

Page 6-57

Table 6-11 has been revised as follows to reflect more recent energy demand projections. Using CEC generation rate projection and SCAG growth assumption for the proposed project and adjusting for projected demand from other uses, the cumulative regional demand for electricity and natural gas in 2010 is estimated at 136,840 Gwh and 1,161 Bcf (16.4 and 24.2 percent higher than DEIR estimates, respectively).

Table 6-11. Annual Regional Energy Consumption Projections in Base Year and Under Proposed Project and Alternatives (2010)

	Unit of Measurement	Consumption in Base Year	Consumption in 2010	Increase in Consumption (Base Year to 2010)	Percentage of Consumption Increase (Base Year to 2010)
Electricity	Gigawatt-hours (Gwh)	76,100 Gwh (1980)	136,840 Gwh 117,600	60,740 Gwh 41,500	79.8 54.5
Natural gas	Billion cubic feet (Bcf)	675 Bcf (1980)	1,161 Bcf 935	486 Bcf 260	72.0 38.5
Motor fuel	Million gallons (MG)	6,096 MG (1979)	6,346-6,864 MG	250-768 MG	4.1-12.6

Notes: Projections are based on housing, employment, and energy consumption estimates for 1979 and 1980, 2007 future generation factors, and 2010 2000 energy demand projections in previous SEAG analyses (Southern California Association of Governments 1982; California Energy Commission 1987, 1988); 2010 regional housing and employment projections (Southern California Association of Governments 1988); and 2010 vehicle-mile projections. (See Chapter 7). It was assumed that housing units in between 1980 and 2010 would demand 2,300 5,913 Kilowatt-hours (Kwh) of electricity and 23,943 51,830 cubic feet (cf) of natural gas per unit per year on average. Projections for commercial and industrial uses are based on the projected number of jobs in increase-in-employees-expected-by-2010, using annual averages of 5,569-Kwh-and-13,542-cf-per-employee-for-commercial-uses-and 285,787-cf-per-employee-for-industrial-uses--it-was-assumed-that-90-percent-of-all-new-jobs-created-in-the-region-between 1980-and-2010-would-be-classified-as-commercial;-and-10-percent-would-be-classified-as-industrial;-based-on-employment-by sector-as-described-in-Chapter-4: 11,170 Kwh and 100,100 cf per job. California Energy Commission (CEC) data are based on Southern California Edison and Southern California Natural Gas service areas and a range of land uses including street lighting, institutional, and unclassified. A conservative approach (assuming 2 percent annual growth in consumption from 2007 to 2010) was used to extrapolate 2010 electricity and natural gas demand projections. The CEC estimates that consumption of electricity and natural gas will increase at an annual rate of 1.89 and 1.74 percent from 1985 to 2007 and 2009, respectively.

Sources: California Energy Commission (1987, 1988); Southern California Association of Governments (1982, 1988i)

Amend the fourth paragraph as follows:

"Both SCE and LADWP are heavily dependent on oil, and natural gas, hydroelectric power, and coal for generation of electrical capacity. ~~Hydroelectric power and coal are other primary sources for these utilities. Because the predominant fuel used in generating electricity is oil, regional supply is highly sensitive to changes in oil prices and to potential disruption of oil supplies. Natural gas availability is highly variable because of changes in total supply and allocations by the State Public Utilities Commission to other sectors (residential uses have the highest priority and utility steam electric generating plants have the lowest priority).~~ Within the past decade, utilities in the region have substantially reduced their dependence on oil-fire generation by converting oil-fired plants to natural gas and adding coal and nuclear capacity. Oil is currently used only as a last resort, when natural gas is not available (Farris pers. comm.)."

Add the following to the fourth paragraph:

"In 1985, approximately 85 percent of energy statewide was generated from petroleum and natural gas. By 2005, it is projected that this share will decline to approximately 65 percent. During the same period, the proportion of the state's energy generated from geothermal sources and resources other than petroleum, natural gas, coal, hydroelectric, and nuclear is expected to increase from 2.3 to 11 percent (California Energy Commission 1987a)."

Amend the fifth paragraph, fifth line, as follows:

". . .water heating (Southern California Association of Governments 1982). Natural gas demand within the SCG service area in 1985 was approximately 495 bcf (California Energy Commission 1987)."

Amend the fifth paragraph, first line, as follows:

"Impact: Increased Electricity and Natural Gas Demand of ~~47,500~~
~~60,740~~ Gigawatt-Hours and ~~260 486~~ Billion Cubic Feet Per Year
Regional consumption of electricity is expected to increase by ~~47,500~~
~~60,740~~ (54.5 79.8 percent) from 76,100 Gwh in 1980 to ~~117,600~~
~~136,840~~ Gwh in 2010, and regional consumption of natural gas would
increase by ~~260 486~~ billion cubic feet (Bcf) (38.5 72.0 percent) from
675 Bcf in 1980 to 935 1,161 Bcf if 2010. . . ."

Amend the fifth paragraph, sixth line, as follows:

"In 1984, out-of-state sources have provided 84 percent of California natural gas supplies, including 66 percent from southwestern U. S. producers and 18 percent from Canada. By 2005, it is projected that 93 percent of the state's natural gas supplies will be provided by such sources, with southwestern U. S. producers' shares declining to

48 percent, Canada's share increasing to 33 percent, and Rocky Mountain and Mexican producers' shares at 10 and 2 percent, respectively (California Energy Commission 1987) ~~most of southern California natural gas supplies, with two companies (El Paso Natural Gas Company and Transwestern Pipeline Company) providing more than 75 percent of supplies between 1976 and 1979 (Southern California Association of Governments 1982).~~"

Amend the sixth paragraph, first line, as follows:

"~~Regional~~ Natural gas demand within the SCG planning area in 1985 was approximately 495 Bcf. . . ."

Page 6-60

Amend the first paragraph, third line as follows:

". . . increasing their reliance on ~~coal, nuclear power, and renewable~~ or alternative resources and technologies."

Amend the third paragraph, seventh line, as follows:

"~~LADWP's and SCE's~~ ~~SCE's and LADWP's~~ projections indicate. . . ."

Page 6-61

Amend the first bullet, second line, as follows:

". . . of the following measures, as needed:"

Amend the second paragraph, third line, as follows:

- "~~reduce projected 2010 regional electricity demand by approximately 30 percent overall-future-natural-gas-demand-in-the region-by-15-percent-or-111.62-Bcf/yr~~ through energy conservation;
- reduce projected 2010 regional natural gas demand by approximately 29 percent ~~overall-future-natural-gas-demand-in-the region-by-15-percent-or-111.62-Bcf/yr~~ through energy conservation;
- reduce projected 2010 regional residential, commercial, and industrial sector energy demand for electricity and natural gas as needed to accomplish the energy conservation objectives indicated above;
- ~~reduce annual residential sector demand by 25 percent or 8,500 Gwh and 73.22-Bcf-per-year-by-applying-California-Title-24 building standards and state and federal appliance efficiency standards to all new construction; require retrofitting of existing buildings (e.g., weatherstripping and insulation) as feasible; shifting consumption to off-peak hours by developing~~

and implementing residential load management standards and rate adjustments (Southern California Association of Governments 1982);

- reduce total annual commercial sector demand by 30 percent or 10,000 Gwh and 23.14 Bcf per year by implementing Title 24 nonresidential building standards to all new construction; installing cost-effective energy conservation equipment in existing commercial buildings; and developing and implementing lighting and commercial appliance efficiency standards (Southern California Association of Governments 1982);
- reduce total annual industrial sector demand by 5 percent or 2,600 Gwh and 15.22 Bcf per year by implementing increased motor and operation and control efficiency standards; installing cost-effective energy conservation equipment on industrial facilities (e.g., boilers); and increasing agricultural pumping efficiency (Southern California Association of Governments 1982);
- provide incentives for cleaner and less energy-intensive industrial development; and promote cogeneration and other practices to reduce manufacturing and industrial energy consumption;
- increase the use of renewable and alternative energy sources (e.g., wind and geothermal) that generally are less capital-intensive and have shorter development lead times than conventional sources; and
- apply measures recommended in the AQMP that would reduce overall the generation of fossil fuel-based electricity within the air basin."

Page 6-62

Amend the first bullet, third line, as follows:

". . . the following measures, *as needed*:"

Page 7-19

Amend the fourth paragraph, ninth line, as follows:

"The following recommended mitigation strategy would ~~not~~ reduce the ~~traffic-congestion-impact~~ *all impact evaluation criteria*, with the exception of vehicle hours of delay, to levels close to or better than those that existed in 1984, thereby reducing this impact to a less-than-significant level; ~~however, it would substantially alleviate much of the problem. Therefore, this impact is unavoidable.~~"

Page 8-28

Amend the third paragraph, first line, as follows:

"The 1982 AQMP. . . ."

Page 8-29

Amend the third column header of Table 8-14 as follows:

"Draft 1988 AQMP Target Emission Levels for Attainment of Standards"

Amend the fourth column header of Table 8-14 as follows:

"1982 AQMP Year 2000 Emissions with AQMP Control Measures"

Add the following footnote to Table 8-14:

"With the exception of CO, the emissions level ranges under the proposed project (with transportation mitigation) and GMA-1 (with transportation mitigation) are identical due to the relatively small proportion of total emissions that are from on-road vehicles. Emissions from stationary, area, and other mobile sources were held constant under the proposed project and GMA-1. (See the 'Methodology for Emissions Projections' section.)"

Page 8-32

Amend the third paragraph, third line, as follows:

". . . below. ~~Both sets of mitigation measures would reduce the significance of this impact, but not to a less than significant level. Therefore, this impact is unavoidable.~~ Those two sets of mitigation measures are meant to encompass feasible transportation, stationary, area, and mobile source control measures. Implementation of both sets of mitigation measures would likely result in less-than-significant impacts for meeting federal CO, SO_x, and inhalable particulate matter standards. However, mitigation of impacts for ROG and NO_x are dependent on technological breakthroughs required by the Draft 1988 AQMP Tier III control measures. Since the feasibility of such breakthroughs is unknown at this time, impacts associated with ROG and NO_x are considered unavoidable. If technological innovations identified in the Draft 1988 AQMP do occur, then ROG and NO_x impacts would be mitigated to less than significant."

Page 8-33

Amend the first paragraph, third line, as follows:

". . . could result in ROG, NO_x, inhalable particulate matter, and SO_x emissions at or below the 1982 AQMP levels shown in Table 8-14; however, it is highly unlikely that implementing these

measures could result in CO or-inhalable-particulate-matter emissions at or below the 1982 AQMP levels shown in Table 8-14.

Amend the third paragraph, fourth line, as follows:

" . . . could result in CO, SO_x, and inhalable particulate matter emissions at or below the target levels shown in Table 8-14, ~~However, it is highly unlikely that implementing these measures could result in ROG, NO_x, or SO_x emissions at or below the target levels~~ thereby reducing ^ximpacts for these pollutants to a less-than-significant level. Attainment of federal ROG and NO_x standards is dependent on the technological and economic feasibility of implementing Tier III control measures."

Amend the sixth paragraph, third line, as follows:

" . . . considered a significant impact. ~~The~~ It is possible that implementing both sets of mitigation measures could result in ROG, NO_x, inhalable particulate matter, and SO_x emissions at or below the 1982 AQMP levels shown in Table 8-14. However, for CO the following mitigation measures would reduce this impact, but not to less than significant. Therefore, ~~this~~ the impact for this pollutant is considered unavoidable."

Page 8-34

Amend the fifth paragraph, second line, as follows:

~~"Implementation of the following mitigation measures could reduce this impact, but not to less than significant. Therefore, this impact is unavoidable. Implementation of both sets of mitigation measures would likely result in less-than-significant impacts for meeting federal CO, SO_x, and inhalable particulate matter standards. However, mitigation of impacts for ROG and NO_x are dependent on technological breakthroughs required by the Draft 1988 AQMP Tier III control measures. Since the feasibility of such breakthroughs is unknown at this time, impacts associated with ROG and NO_x are considered unavoidable. If technological innovations identified in the Draft 1988 AQMP do occur, then ROG and NO_x impacts would be mitigated to less than significant."~~

Page 8-35

Amend the first paragraph, third line, as follows:

" . . . could result in CO, SO_x, and inhalable particulate matter emissions at or below the target levels, ~~However, it is highly unlikely that implementing both of these types of measures could result in ROG, NO_x, or SO_x emissions at or below the target levels.~~ thereby reducing ^ximpacts for these pollutants to a less-than-significant level. Attainment of federal ROG and NO_x standards is dependent on the technological and economic feasibility of implementing Tier III control measures."

Amend the third paragraph, fifth line, as follows:

" . . . considered a significant impact. ~~The~~ *It is possible that implementing both sets of mitigation measures could result in ROG, NO_x, inhalable particulate matter, and SO_x emissions at or below the 1982 AQMP levels shown in Table 8-14. However, for CO the following mitigation measures would reduce this impact, but not to less than significant. Therefore, this the impact for this pollutant is considered unavoidable.*"

Amend the fifth paragraph, third line, as follows:

" . . . ROG, NO_x, *inhalable particulate matter*, and SO_x emissions at or below the 1982 AQMP levels. However, it is highly^x unlikely that implementing both of these measures could result in CO ~~or-particulate-matter emissions~~ at or below the 1982 AQMP levels."

Page 10-5

Amend the first bullet, second line, as follows:

" . . . plans, should ~~adopt~~ *consider adopting* policies. . . ."

Amend the second bullet, first line, as follows:

"o SCAG should ~~develop~~ *consider developing* a comprehensive. . . ."

Page 10-6

Amend the first bullet, second line, as follows:

" . . . plans, should ~~adopt~~ *consider adopting* policies. . . ."

Page 10-7

Amend the first bullet, second line, as follows:

" . . . plans, should ~~adopt~~ *consider adopting* policies. . . ."

Page 10-8

Amend the first bullet, second line as follows:

" . . . plans, should ~~adopt~~ *consider adopting* policies. . . ."

Page 10-10

Amend the first bullet, first line as follows:

"o Local jurisdictions in the SCAG region should ~~adopt~~ *consider adopting* policies. . . ."

Amend the first bullet, first line as follows:

"o Local jurisdictions in the SCAG region should ~~adopt~~ *consider*
adopting policies. . . ."

CHAPTER 5. BIBLIOGRAPHY

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APPENDIX I. RESPONSE TO COMMENTS RELATED TO THE MERITS OF
THE DRAFT GROWTH MANAGEMENT PLAN

RESPONSES TO THE COMMENTS OF THE CITY OF IRVINE
COMMUNITY DEVELOPMENT DEPARTMENT
(NOVEMBER 14, 1988)

- 4.1. SCAG's Executive Committee is composed of locally elected officials from throughout the six-county SCAG Region. Furthermore, SCAG has several policy, technical, and advisory committees to involve other electeds as well as private sector representation. Collectively these committees have provided planning guidance and direction in the development of the GMP, its policies and its implementation program.
- 4.2. SCAG is currently preparing a popular public summary and explanation of the three plans that will discuss the interrelatedness and implementation process. The as yet untitled document will be available in the winter/spring period of 1989.
- 7.1. Page I-1: The Draft 1988 AQMP (September 1988) on page 3-8 states, "The years 2000 and 2010 were chosen for baseline emission forecasts which indicate future emissions if no additional regulations were adopted after January 1, 1988." The page further states, "In Appendix III-D, SCAG's baseline growth forecast for population and employment is presented."
- 7.2. Page I-3: An explanation of "restructuring" of growth management systems has been added in response to this comment.
- 7.3. Page II-5: Figure headings have been changed in response to this comment.
- 7.4. Page II-5: Figure II-4 represents total housing unit growth over five-year periods.
- 7.5. Page II-5: A line graph of regional housing trend and forecast has been added in response to this comment.
- 7.6. Page II-6: This assumes there will be a real increase in personal income over the next 20 years with an adjustment for inflation.
- 7.7. Page II-6: Decline in fertility rates among the Hispanic group is assumed to contribute to a smaller household size.
- 7.8. Page II-6: Examples of wage and job skills will be added in the GMP in response to this comment.
- 7.9. Pages II-8 and 9: County numbers are presented for population, housing, and employment for all alternatives.
- 7.10. Page III-3: The range of lane-miles includes existing lanes and are not in addition to existing lane-miles.
- 7.11. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
- 7.12. Page IV-2: To better understand the impacts of j/h balance on congestion, the commentor is referred to various tables in Chapter 7 of the Draft GMP EIR (October 1988). Comparing GMA-1 against GMA-2 provides the best illustration of congestion reduction attributed to only j/h balance.

- 7.13. Page IV-5: A balance of type of job with the price of housing may create a better jobs/housing balance and provide greater economic opportunity and/or affordable housing. SCAG is currently examining this issue for further consideration.
- 7.14. Page VII-1: Levels under the GMA-4 Modified Jobs/Housing Alternative were used in the AQMP (Pages 4-10 through 4-41, Draft EIR 1988 Revision to the AQMP).
- 7.15. Page VII-2: Matching the price of housing and household income may be a better indicator of jobs/housing balance; the data is not readily available at this time. SCAG is currently examining this issue for further consideration.
- 7.16. Page VIII-1: First, the benefits of jobs/housing balance must be demonstrated through an outreach and information system. Jobs/housing balance will be monitored on a yearly basis. Although not recommended in the Draft GMP, it should be noted that the SCAQMD could develop more stringent provisions and more vigorously enforce an Indirect Source Rule and New Source Review; the Regional Water Quality Control Boards (RWQCB) could expand the application of the National Pollutant Discharge Elimination System; and the State Housing and Community Development Department could require stricter implementation of the housing laws. Other potential actions could include state review of laws governing local general plans and recommended changes to existing redevelopment laws.
- 7.17. Page VIII-1: Benefits of jobs/housing balance will be highlighted through the outreach process and a far-reaching educational effort. In addition, consistency with the regional objectives of SCAG and the California Transportation Commission can help in the approval of funds for facility projects and transportation improvements in their jurisdictions.
- 7.18. Page VIII-2: Representation in the subregional entities is in the local jurisdiction's best interest, but not mandatory.
- 7.19. Page VIII-3: This time schedule would be in line with the implementation of the AQMP. The 1 year is recommended, but not mandatory.
- 7.20. Page VIII-4: An example of "balance-promoting infrastructure improvement" has been added to the Draft GMP in response to this comment.
- 7.21. Page VIII-4: Monitoring will be conducted by SCAG, with the assistance and review of local jurisdictions and the subregional entities.
- 7.22. Page A1-1: While cooperation of all jurisdictions is desired, the implementation process is voluntary to local jurisdictions.
- 7.23. Page A1-2: The issue of housing cost will be given further consideration.

- 7.24. Page A1-2: The strategies and techniques presented in the Draft GMP are a menu of actions that can be undertaken by local jurisdictions to support the jobs/housing balance objective. Local jurisdictions can choose from this list or develop their own to fit their condition. SCAG's task is to develop a menu of actions.
- 7.25. Page A1-4: Local jurisdictions should establish regional and local priorities for building the infrastructure needed to support jobs/housing balance.
- 7.26. Page A1-4: Strategy 4b should be implemented by local jurisdictions; however, SCAG could incorporate this strategy into its plans and the A-95 Review Program.
- 7.27. Page A1-4: Participation in SCAG and the subregional entities could allow effected agencies to provide input as well as a system that will resolve conflicted priorities.
- 7.28. Page A1-5: Incentives would be provided to commercial and industrial developers in job-poor areas and to residential developers in housing-poor areas. Exactions would be imposed on commercial and industrial developers in job-rich areas.
- 7.29. Pages A2-3: While participation is voluntary, local jurisdictions should develop general plans that incorporate regional and local jobs/housing balance objectives.
- 7.30. Page A2-5: Review by a regional authority may slow the process; however it ensures conformity with regional goals and objectives.
- 7.31. Page A2-7: True, however overall travel times would still be reduced due to shorter trip lengths.
- 7.32. Page A2-8: This choice can be decided by the local jurisdiction.
- 7.33. Page A2-24: This quota system could be a measure used by a local jurisdiction that is in a housing-rich subregion, but the Regional Housing Needs Assessment (RHNA) does not take into account growth limitation measures in the determination of housing needs.
- 7.34. Page A2-24: Monitoring will be conducted by SCAG, with the assistance and review of local jurisdictions and the subregional entities.

RESPONSES TO THE COMMENTS OF THE CITY OF ANAHEIM
(NOVEMBER 17, 1988)

14. The GMP will be adopted at the subregional level; however, small area forecasts (i.e., city, census tracts) will be developed by SCAG's Small Area Forecast Model for technical purposes. City forecasts will be available in January 1989.
- 17.1. The final GMP will include a list of cities and subregions. The GMP identifies job-rich/housing-poor and housing-rich/job-poor only at the subregional level.
- 17.2. The GMP does not present jobs/housing balance at the city level; however, the City of Anaheim is split by the Northwest Orange County Subregion and Southeast Orange County Subregion. Both subregions are currently job rich/housing poor.
- 17.3. SCAG is currently examining the issue of matching job type with housing costs for future consideration.
- 17.4. Employment development in job-poor areas can be accomplished by targeting labor force retraining programs in job-poor localities.
- 17.5. Each local jurisdiction will have different policies related to jobs/housing balance for its subregion. All the local policies cannot be presented in the GMP, but can be found in local general plans.
- 18.1. Implementation of jobs/housing balance is undertaken by local jurisdictions. A city that is impacted either on the housing or on the job side will not be compelled to grow beyond its capacity. Within a subregion, local jurisdictions can trade targets and negotiate measures. Cities are provided with a choice of measures, and they can develop their own measures that are applicable to their own situation.
- 18.2. Both the A-95 Review Program and the Transportation Improvement Program review projects for consistency with adopted SCAG forecasts, plans, and policies.
- 18.3. J/H Balance is presently limited to subregional performance goals. The purpose of J/H balance is not to penalize any jurisdiction, but rather to encourage new job or new housing project into subregions where balance could be improved. Cities have the option to negotiate trade of jobs or housing projects within their subregions.

- 18.4. This proposal is a goal, not a local implementation standard. Appropriate local review criteria are needed.
- 18.5. Anaheim is in a job-rich subregion. Permit issuance would be handled through the local permitting process. If proposed development does not meet performance goals and contributes to jobs/housing imbalance, local jurisdictions could require mitigation measures (i.e., conditional permits). Cities would be responsible for ensuring land use compatibility.
- 18.6. Such project approvals would be based on their being no undue restraints on development, whether they be infrastructure, environmental, or other considerations. See Responses 17.2 and 18.5.
- 18.7. Mitigation measures, such as conditional permits, could provide infrastructure improvements. Cities can negotiate trades on performance goals to avoid penalizing balanced communities.
- 18.8. This measure would require interagency coordination but would not create a new regulatory body.
- 18.9. All measures are intended to impact new industries, not push or pull existing industries that are currently operating in a jurisdiction.
- 18.10. Incentive measures can be found in Appendices 1 and 2 of the Draft GMP.
- 18.11. A possible measure would be to encourage jurisdictions in job-rich subregions with housing quotas and building permit limitations to ease their ordinances. It would not have an impact on the quality of housing built.
- 18.12. Transportation demand management measures would provide accessibility between residential and employment areas.
19. The methodology used in developing the jobs/housing balance numbers by subregions is explained in the Draft GMP. The population and housing data through 1988 is from the State Department of Finance (DOF); employment data is from the State Employment and Development Department (EDD).
20. See previous responses to the City of Anaheim's comments.

RESPONSES TO THE COMMENTS OF THE CITY OF ONTARIO
(NOVEMBER 17, 1988)

27. For greater clarification of implementation, see the revised "Implementation" chapter of the Draft GMP.

Implementation of jobs/housing balance by local jurisdictions is voluntary; however, cities should develop general plans that incorporate regional and local jobs/housing balance objectives as well as elements of the AQMP and RMP. SCAG, through the A-95 Review Program can influence the issue of federal resources to a project that adversely impacts the jobs/housing balance in a subregion. The Transportation Improvement Program is another mechanism that can be used by SCAG. SCAG can recommend that funds for transportation projects be consistent with the objectives of the jobs/housing balance policy.

Furthermore, if by January 1, 1994, it is estimated that the jobs/housing imbalance performance goals will not be met, the performance goals and measures to attain them could be reassessed. For areas where jobs/housing balance has worsened, additional implementation measures could be considered. In addition, while not recommended in the GMP, the SCAQMD could develop more stringent provisions of and more vigorously enforce an Indirect Source Rule and New Source Review; the RWQCBs could expand the application of the national Pollutant Discharge Elimination System; and the State Housing and Community Development Department could require stricter implementation of the housing laws. Other potential actions could include state review of laws governing local general plans, and recommended changes to existing redevelopment laws.

28. Any additional authority granted under indirect source legislation would strengthen the potential for implementing air quality control strategies. Adoption of such legislation may preclude the need for a voluntary implementation program.

RESPONSES TO THE COMMENTS OF THE IRVINE COMPANY
(NOVEMBER 18, 1988)

35.1. Comment noted.

35.2. Specific growth levels or performance goals are not mandated, but are developed through the cooperation of local jurisdictions, sub-regional entities, and SCAG. Also, cities may elect to trade their performance goals with other cities within the subregion so long as the subregional incremental ratio is maintained.

The intent of the jobs/housing balance policy is to improve the transportation system and the air quality over the baseline or trend projection, which assumes continuation of market forces. If market forces and trend continued, the region's transportation and air quality would be significantly worse. However, with the implementation of jobs/housing balance, commute distance and reactive organic gases emissions are reduced.

The regional jobs/housing balance proposal should be viewed as a mitigation measure to minimize or reduce environmental impacts. Implementation of balance is very difficult and may ultimately require major regulatory or legislative changes. Clearly, there are benefits if balance can be implemented.

In response to the comment that Orange County "exports" workers, the GMP forecast of employment in Orange County has been increased by 27,000.

35.3. In response to the comment that jobs/housing balance could be defined by performance standards, the "Implementation" chapter of the Draft GMP has been revised. In place of jobs/housing balance targets, incremental jobs/housing balance ratios will be used as a standard for evaluating the progress of the jobs/housing balance policy. Incremental jobs/housing balance ratio is a performance goal.

35.4. SCAG will continue to use the GMA-4 Modified Jobs/Housing Alternative regional total in the GMP, based on both technical and legal reasons.

SCAG's GMP is based on the GMA-4 Modified Jobs/Housing Alternative that forecasts 18.3 million people by the year 2010 -- about 1.2 million higher than DOF's projection of 17.1 million. Most of the differences between the DOF's and SCAG's projected level of growth are due to differences in methodology and assumptions, specifically, natural increase. The SCAG forecast assumes births, death, and migration rates by ethnicity. In order to achieve the DOF total, all the ethnic fertility rates would have to be merged to the projected white rate in the year 2010; the survival rates would also need to be lowered, and the in-migration to the region would need to be reduced to maintain the same net migration levels. Demographic experts and SCAG believe that SCAG's set of assumptions are better for the region than DOF's.

This lower regional total (17.1 million) is presented in the GMP as an alternative (CMA-Low) and assessed in the DEIR.

We have reviewed current legislation and administrative policies relative to consistency in the use of population projections. Our conclusion is that the region can develop and use its own growth projections for air quality, housing, transportation, and water quality planning.

RESPONSES TO THE COMMENTS OF THE LOS ANGELES
COUNTY SANITATION DISTRICTS
(NOVEMBER 18, 1988)

- 37a. The GMP will be adopted at the subregional level; however, small area forecasts (i.e., city, census tracts) will be developed by SCAG's Small Area Forecast Model for technical purposes. See also Response 14.

The 2010 daily wastewater treatment capacity surplus and shortfalls are based on 2010 county population projections; 2010 per capita average daily wastewater flows (ADWF) by county; and 2010 wastewater treatment capacity, including all existing plus funded capacity programmed for construction as of 1985. Many districts have expansion plans that are unfunded; these have been excluded because of their uncertainty. Shortfalls are based on the difference between projected ADWF and capacity, but would be more severe than indicated since treatment plants must be sized to handle peak flows, which can be up to 25 percent higher than ADWF. Capacity figures listed also do not reflect type of treatment capability.

We recognize that the wastewater agency's responsibility is to attain an acceptable level of wastewater treatment in accordance with the Clean Water Act and the State Water Resources Control Board (SWRCB) regulations; however, the phasing and timing of development in this region is largely dependent on wastewater treatment expansions. The intent of the GMP is to define the desirable rate of growth for the region in order to accomplish the jobs/housing balance objective.

Chapter III, "Summary of Baseline Impact Assessment," has been deleted in the Draft GMP to avoid confusion with the EIR. The EIR presents impacts for all alternatives presented in the Draft GMP, including GMA-1.

- 37b. For the past several years, SCAG has requested funding from the SWRCB for 208 Plan updating. Thus far, SWRCB has not funded these requests. If funds can be made available, the 208 Plan should be updated and made in conformance with SCAG's GMP. The plan update may be prepared for the entire region or incrementally by water basins. Until the 1979 208 Plan is updated, SCAG will be limited to reviewing future water projects based on the 1979 Plan.
- 37c. Implementation of jobs/housing balance is based on the voluntary participation of local jurisdictions. Local jurisdictions select the measures necessary for achievement of jobs/housing balance targets. While not recommended in the Draft GMP, the SCAQMD could develop more stringent provisions of and more vigorously enforce an Indirect Source Rule and New Source Review; the RWQCBs could expand the application of the National Pollutant Discharge Elimination System; and the State Housing and Community Development Department could require stricter implementation of housing laws. Other potential actions

could include state review of laws governing local general plans and recommended changes to existing redevelopment laws.

- 37d. SCAG recognizes the limitation of regulating infrastructure through funding; however, the RWQCB and the SWRCB do set priorities for funding of most wastewater facilities and thus funding is the best tool we have for influencing infrastructure extensions consistent with SCAG's growth forecast. SCAG's 208 Plan is also intended to look at the relationship between land use development and infrastructure capacity; however, SCAG has not been able to revise this document.

RESPONSES TO THE COMMENTS OF THE COUNTY OF ORANGE
ENVIRONMENTAL MANAGEMENT AGENCY
(NOVEMBER 18, 1988)

47a. See Response 27.

47b. The implementation process proposes that cities will decide on whether to grant housing and commercial/industrial permits. Implementation of jobs/housing balance is undertaken by local jurisdictions. A city which is impacted either on the housing or on the job side will not be compelled to grow beyond its capacity. Within a subregion, local jurisdictions can trade performance goals and negotiate measures. Cities are provided with a choice of measures, and they can develop their own measures that are applicable to their own situation.

Private interest groups are envisioned as a part of the subregional entity and will participate in the jobs/housing balance implementation process. Included in the menu of measures are incentives for developers to build housing in job-rich areas and commercial/industrial facilities in job-poor areas. (See Appendices 1 and 2 of the Draft GMP.)

Modifying components of local general plans which would redistribute the existing pattern of land use in areas that are as yet undeveloped is an option which local jurisdictions may choose. Local jurisdictions have the option to choose implementation measures appropriate to the local condition.

51. The GMP will be adopted at the subregional level and not at the city level. The methodology used in developing the jobs/housing balance numbers by subregions is explained in the Draft GMP. The population and housing data through 1988 is from DOF, and employment data is from EDD.

The city forecast based on the GMA-4 Modified Jobs/Housing Alternative will be developed in January 1989 for technical purposes. In 1987 and 1988, SCAG sent surveys to all the jurisdictions in the region, asking for data and input; however, no comments were received from the City of Pomona.

SCAG's RHNA Committee and the Community Economic and Human Development Committee approved the City of Pomona's request to lower future housing need based on limited site availability. However, no changes will be made to the subregional numbers on account of Pomona's RHNA revision.

52. The data used to determine future growth was based on the population and housing trend data from DOF, local input, and the jobs/housing balance policy. On account of the jobs/housing balance policy (GMA-4 Modified Jobs/Housing Alternative), the trend projection for East San Gabriel Valley subregion was reduced.

RESPONSES TO THE COMMENTS OF THE CITY OF REDLANDS
(NOVEMBER 18, 1988)

54. Since the basis of housing market demand is in existing and past trends, the GMP utilizes this information in projecting future growth.

Housing price differentials between inland and coastal areas for single and multifamily housing are not the only influences on preferences for home location. Desirable places to live, such as the City of Redlands, are attractive to different households for different reasons. We have no basis for determining how many people would live elsewhere, if just relatively more housing were available, without examining the whole pattern of past housing and lifestyle choices. This bit of history is best expressed and summarized as market demand.

55. Communities will not be penalized for achieving jobs/housing balance at relatively faster or slower rates. Several indicators of progress towards achievement of jobs/housing balance performance goals will be evaluated through the monitoring process.

RESPONSES TO THE COMMENTS OF THE CITY OF SANTA ANA
(NOVEMBER 18, 1988)

56. Orange County's employment forecast under GMA-4 Modified Jobs/Housing Alternative has been increased by 27,000; thus, the county and cities will continue to show significant job growth.
- Local jurisdictions may approve projects that lead to an excess of jobs on the condition that performance goals and incremental jobs/housing balance ratios be maintained and that mitigation measures ensure housing development.
57. SCAG does not recommend these actions in its implementation process; however, the SCAQMD could develop more stringent provisions of and more vigorously enforce an Indirect Source Rule and New Source Review.
58. See Response 34.
59. The GMP will be adopted at the subregional level; however, small area forecasts (i.e., city, census tract) will be developed by SCAG's Small Area Forecast Model for technical purposes. See Response 14.
60. The monitoring section of the Draft GMP "Implementation" chapter has been revised. The monitoring process will evaluate the effectiveness of chosen implementation measures toward accomplishment of the performance goals.
61. Comment noted.
- 62a. Local jurisdictions should develop general plans that incorporate regional and local jobs/housing balance objectives and elements of the AQMP and RMP.
- 62b. Rather than create a new agency, the Draft GMP recommends the formation of subregional entities.
- 62c. Refer to Response 56.
- 62d. While not recommended in the Draft GMP, the SCAQMD could develop more stringent provisions of and more vigorously enforce an Indirect Source Rule and New Source Review; the RWQCBs could expand the application of the National Pollutant Discharge Elimination System; and the State Housing and Community Development Department could require stricter implementation of housing laws. Other potential actions could include state review of laws governing local general plans and recommended changes to existing redevelopment laws.
63. Refer to Responses 56 and 57. Tax-revenue sharing is listed as an implementation measure in Appendix 1 of the Draft GMP.

64. Refer to Response 59. The methodology used to develop the GMA-4 Modified Jobs/Housing Alternative is discussed in the "Recommended Alternative" chapter in the Draft GMP.
- 65a. A jobs/housing balance can be attained because the implementation process is politically feasible. Implementation is carried out by existing authorities who are guided by presently available regulatory measures. In addition, participation by local jurisdictions is voluntary. Many of the measures are already being implemented by local jurisdictions. For example, within southern California, at least 29 local jurisdictions are explicitly using infrastructure funding as a growth-management technique, based on a SCAG survey conducted in 1984.
- 65b. The GMP only provides the opportunity to live and work in accordance with the distribution of jobs and housing.
- 65c. The socioeconomic impact analysis will address these points. See Response 34.
- 65d. The intent of the jobs/housing balance strategy is to plan growth by directing jobs to housing-rich and housing to job-rich areas, because free market forces alone would show a greater jobs/housing imbalance in the future.
- 65e. Implementation is carried through by existing authorities and guided by available regulatory measures, with consideration of incremental legislative action if local action fails.
- 65f. Refer to SCAG's RHNA.
- 65g. As part of the proposed implementation process, the first step is to initiate an outreach program that will muster regionwide support for the jobs/housing balance strategy.

RESPONSES TO THE COMMENTS OF THE COUNTY OF VENTURA
SOLID WASTE MANAGEMENT DEPARTMENT
(NOVEMBER 18, 1988)

89. Chapter III of the Draft GMP, "Baseline Impact Assessment," has been deleted to avoid confusion with the EIR, which includes impacts for all alternatives, including GMA-1.

See Responses 90 through 94.

CITY OF CORONA
(12/7/88)

- 94c. Recent trend seem to indicate that market forces tend to improve J/H balance. The GMP attempts to accelerate the natural trend towards J/H balance.

As discussed in the Implementation chapter of the GMP, the final authority for selection of implementation measures rests with local jurisdictions. However, SCAG's responsibility will be to develop J/H balance performance goals for subregions and local jurisdiction. This task will have the assistance of local jurisdictions and subregional entities.

- 94d. Subregional Entities are to be a formal group that will participate in the implementation process in collaboration with local jurisdictions and SCAG. Subregional Entities are not public agencies and participation is voluntary.

- 94e. The GMP would result in a reduction of vehicle miles traveled and in congestion, thereby an improvement to air quality. In the report, Socio-economic Impacts of the AQMP, RMP, and GMP (Dec., 1988), it found a net benefit from the GMP in terms of both dollars and jobs.

- 94k. Implementation of J/H balance is based on the premise that it be carried out by existing authorities and guided by presently available regulatory measures. As mentioned in the Implementation chapter of the GMP, SCAG's task is to promote implementation of the J/H balance policy and to advertise the improvements to transportation and air quality. However, through the A-95 Review Program and the Transportation Improvement Program, SCAG can make recommendations for federal funding.

RESPONSES TO ORAL TESTIMONY RECEIVED AT
THE PUBLIC HEARING ON NOVEMBER 3, 1988

Joel Rosen, City of Fullerton

99. Subsequent to the hearing, the City of Fullerton received copies of all documents it formally requested.
101. Staff has been cautioned by the Executive Committee about the release of preliminary and working numbers used in generating regional demographic numbers. However, every effort has been made to enable the City of Fullerton to thoroughly review the methodology and calculations which resulted in the Draft GMP.

RESPONSES TO THE ORAL TESTIMONY RECEIVED AT
THE PUBLIC HEARING ON NOVEMBER 18, 1988

Bill Gayk, County of Orange

105. See Response 35.4.

106. The AQMP, GMP, and RMP are all scheduled for adoption in February or March 1989. The RHNA was adopted by the Executive Committee in June 1988. The RHNA is based on the GMP's GMA-4 Modified Jobs/Housing Alternative.

107. The employment forecast for Orange County has been increased in the GMP by 27,000 in response to this comment.

Margo Koss, Sierra Club

108. We agree that funding for the GMP subregional planning process should come from federal, state, and local agencies that have responsibility currently for implementing the major regional plans.

The implementation of the AQMP will require extensive regional and subregional cooperation. It may entail the formation of new planning groups or governmental entities. Funding for this process is to be determined as the process is defined.

Ken Bauer, Foxmoor Homeowners' Association

109. The function of SCAG is to examine development, transportation, environmental, and economic issues from a regional and subregional perspective. The A-95 Review Program examines the impacts from the individual project as well as cumulative effects, the effects when combined with other projects in the subregions. In addition, the three SCAG plans are regional in scope and require both regional and subregional analysis.

110. This comment cannot be directly addressed in the GMP; however, impacts of growth on education are presented in the GMP EIR.

111. One of the GMP policies is to encourage growth to occur in and around:

- o activity centers,
- o transportation nodes and corridors,
- o underutilized infrastructure systems, and
- o areas needing recycling and redevelopment.

112. Parking taxes and surcharges are considered "user fees" which are considered in the financing chapter of the RMP.
113. To abandon all projects based on assessment of congestion levels might unfairly penalize the community which has been leapfrogged by growth and suffers from through-traffic congestion.

Bill Wren, Ontario Chamber of Commerce

114. The outlying areas of the region (i.e., San Bernardino and Riverside Counties) are part of SCAG and thus are included in all of SCAG's analyses. A major focus of the GMP is jobs/housing balance, which emphasizes the importance of employment growth in job-poor areas, such as San Bernardino and Riverside Counties.
115. For the response to how jobs will be affected by the AQMP, refer to the AQMP EIR.
116. Urban form is discussed in Appendix 3 of the Draft GMP and in a policy. Because of the limited availability of land use information at this time, an urban form map cannot be presented. Based on SCAG's Geographic Information System, which is currently being developed, SCAG will have the capability to produce land use maps for the region that are based on local general plans.
117. The GMP promotes the growth of a certain number of jobs and housing in part of the region through incentives and other jobs/housing balance measures. The GMP provides the opportunity for people to move.
- Jobs/housing balance as a policy is feasible, since it is proposed that it be enforced voluntarily by existing entities and guided by presently available regulatory measures.
- Cities have the option to choose from the provided menu of measures, or they can develop their own measures that are applicable to their own situation.
119. The GMA-4 Modified Jobs/Housing forecast does emphasize job growth in job-poor/housing-rich areas through implementation measures, such as enterprise zones, infrastructure funding, and incentives.
120. The trend projection shows that a large proportion of the population growth will be in the inland counties by the year 2010, while employment growth will center around the coastal counties. With the jobs/housing balance policy, however, growth patterns are forecast to shift, with more jobs going to San Bernardino and Riverside Counties and more housing units going to Los Angeles and Orange Counties. Even with the shifts due to the jobs/housing balance policy, the inland counties will have significant population growth.
121. The AQMP is based on the distribution of the GMA-4 Modified Jobs/Housing Alternative of the GMP (Executive Committee approval given on May 30, 1988).

If market forces and trend drove the region's future growth patterns, the transportation system and the air quality of the region would become significantly worse than they are today. However, implementation of jobs/housing balance would result in the reduction of commute distance and reactive organic gas emissions from mobile sources.

Regarding the awkwardness of moving businesses and New Source Review, a new New Source Review rule will be workshopped in early 1989 which, if approved, will address this concern.

Fred Fujioka, Minority Coalition of Responsible Growth

122. Through the proposed jobs/housing balance policy, the GMP is designed to avoid exacerbation of present inequities by encouraging housing development and redevelopment and promoting accessible housing by ensuring an adequate supply where it is needed.

The GMP's jobs/housing balance policy is designed to ensure a more even distribution of employment and housing opportunities throughout the region by promoting growth in housing and housing types near where people work and growth in employment near where people live and where more employment opportunities are needed. By increasing the housing stock to adequately meet the needs of the growing population, housing becomes more accessible and more affordable.

The GMP is developed to avoid socioeconomic polarization of the region. This issue is discussed in one of the appendices of the report.

123. The implementation of the jobs/housing balance strategy is first carried out by existing authorities who are guided by presently available regulatory measures. In addition, participation by local jurisdictions is voluntary; however, if local actions fail, then regulatory bodies (i.e., the SCAQMD, RWQCBs, or the State Housing and Community Development Department) could develop more stringent provisions of and more vigorously enforce rules and laws.

Austin Sullivan, City of Ontario

124. See Response 1.

125. See Response 34.

Joel Rosen, City of Fullerton

126. See Response 1.

- 127a. The implementation program is feasible and workable as it is based on the premises that implementation be carried through by existing authorities, guided by presently available regulatory measures and presupposes the participation of local jurisdictions.
- 127b. The J/H balance concept is fundamentally a mitigation effort which benefits the entire region by reducing; transportation facility costs, traffic congestion and air emissions. It is not an economic development plan for any particular subregion.
- 127c. Although difficult to implement, demand management strategies are an important contributor to air quality improvements and traffic congestion relief. To de-emphasize demand management would reduce air quality improvements and increase transportation costs.

Doris Bradshaw, Private Citizen

128. SCAG concurs that no agency should proceed in violation of the nation's established air quality standards; however, this issue is not pertinent to the review of the GMP and RMP, and respective EIRs, and deals with an issue over which SCAG has no authority.
129. The GMP DEIR addresses regional hydrologic issues in Chapter 11. Site-specific issues are beyond the scope of this EIR.

Ontario Chamber of Commerce

130. The AQMP is based on the distribution on the GMA-4 Modified Jobs/Housing Alternative of the GMP (Executive Committee approval on May 30, 1988).
131. This match of type of job with price of housing is currently being examined for future consideration. See Response 17.3.
132. The RHNA was based on the GMP's GMA-4 Modified Jobs/Housing Alternative forecast.
133. The data used in the development of the baseline projection was the DOF population and housing estimates. Annual data from DOF was available only from 1970.
134. Policy 6 (encouraging growth in and around centers, nodes, and corridors) is consistent with the jobs/housing balance policy. This policy encourages the growth forecast for the subregion to occur in and around centers. The subregional forecast reflects jobs/housing balance.
135. The contingency analyses were prepared for discussion purposes and are not a recommendation in the GMP.
136. Economic growth in the past five years has been more rapid than projected under baseline.
137. Some changes have been made to San Bernardino's projections (very minor, not warranting new EIR) after meeting with SANBAG, county and city representatives and are incorporated in the December issue.

138. No implementation measure is required of the local jurisdiction. It is the jurisdiction's choice as to which measures to implement. Appendices 1 and 2 contain menus of possible implementation measures from which local jurisdictions can choose.

The purpose of the monitoring process is to provide feedback on effectiveness of chosen implementation measures toward accomplishment of the jobs/housing balance performance goals.

139. Incentives are listed in Appendices 1 and 2 of the Draft GMP.

140. The funds could be dispersed by a variety of existing agencies or possibly new agencies (local governments, special districts, regional joint-power authorities, or the state).

141. There would be an incremental jobs/housing balance ratio for the subregion. Cities within a subregion, with the participation of sub-regional entities if they so elect, can trade performance goals as long as the subregional incremental ratio is maintained.

142. The implementation of any measure will be the decision of the local jurisdiction. If a jurisdiction is in a subregion where the implementation of an enterprise zone would be inconsistent with the AQMP, another measure might be used.

143. #11: We agree. The issue of cost of housing and type of job is currently being examined for future consideration. See Response 17.3.

144. #13: Feasibility to implement this measure is based on current LAFCO guidelines for incorporation.

145. Comment noted.

146. #16: Cities can still pursue redevelopment as long as they continue to achieve the jobs/housing balance performance goal.

147. A(2): The GMP is flexible to include all cities.

148. A(3): We agree. SCAG's implementation process would not require local jurisdictions to conform; implementation would be on a voluntary basis. SCAG does review projects, however, for conformity with SCAG's plans.

149. GMP policy encourages growth to occur in and around activity centers, transportation nodes, and corridors.

150. Performance goals and not attainment of set targets at the subregional level are proposed in the December 1988 version of the Growth Management Plan.

151. The implementation measures represent a menu of choices from which local jurisdictions can select and act on.

RESPONSES TO THE ORAL TESTIMONY RECEIVED AT THE DEIR
PUBLIC HEARING ON DECEMBER 15, 1988

ORANGE COUNTY DIVISION, LEAGUE OF CALIF. CITIES
RON BATES (12/15/88)

160. The GMP does not specify which of the measures should be implemented, rather it provides a list of actions from which local jurisdictions can select an appropriate implementation measure to achieve the J/H balance performance goal.

While it is not automatically assumed that job growth will shift from a job-rich to a job-poor subregion, jobs could be attracted to job-poor subregions with the implementation of incentives such as: tailoring their economic activities to industrial requirements; creating enterprise zones; streamlining the review and approval process for commercial and industrial development.

161. There is no mandate in the GMP to move businesses to a specific location, however, through incentives (see Response 160) businesses are encouraged to select a job-poor subregions.

The Plan impacts new businesses in job-rich subregions. Local jurisdictions could grant permits to projects that lead to an excess of jobs on the conditions that: 1) the performance goals and incremental J/H balance ratios are maintained and growth does not exceed the area's infrastructure capacity; and 2) mitigation measures insuring housing development and/or balance promoting infrastructure improvements are met.

While J/H balance may be at the expense of some job-rich subregions, the goal of this policy is achieve regional transportation and air quality benefits.

162. The issue of balancing types of jobs and type of housing is brought up in the Plan and will be further elaborated by the J/H balance task force.

ORANGE COUNTY DIVISION, LEAGUE OF CALIF. CITIES
BOB DUNEK (12/15/88)

165. Refer to Response 160.

165a. The Plan is politically feasible as mentioned in the Introduction section of Chapter VII of the GMP. Financially, the regional impacts are analyzed in the report, Socio-economic Impacts of the AQMP, RMP, and the GMP.

165d. SCAG's GMP is based the GMA-4 Mod. J/H alternative which forecast 18.3 million people by the year 2010--about 1.2 million higher than the State Dept. of Finance's projection of 17.1 million. Most of the differences between the DOF and SCAG levels of growth are due to differences in methodology and assumptions, specifically, natural increase. The SCAG forecast assumes births, deaths and migration rates by ethnicity. In order to achieve the DOF total, all the ethnic fertility rates had to be merged to the projected white rate in the year 2010, the survival rates were also lowered and the in-migration to the region was reduced to maintain the same net migration levels.

This lower regional total (17.1 million) is presented in the GMP as an alternative (GMA-LOW J/H) and assessed in the EIR.

We have reviewed current legislation and administrative policies related to consistency in the use of population projections. Our conclusion is that the region can develop and use its own growth projections for air quality, housing, transportation and water quality planning.

165e. Implementation of J/H balance is based on the premise that it be carried out by existing authorities and guided by presently available regulatory measures. The only new body that is propose is the Subregional Entities which are envisioned as a group of representatives from local l governments, public and private interest groups established to participate in the J/H balance implementation process. Subregional Entities are not a regulatory agency. However, a SCAG proposal for the establishment of any regional regulatory structure would need approval of SCAG's Executive Committee which is composed of representatives of counties and cities in the region.

LOS ANGELES CHAPTER, AMERICAN INSTITUTE OF ARCHITECTS
MARK FUTTERMAN (12/15/88)

168. The LA 2000 report clearly states the need for a Regional Growth Management Plan, one of the primary objectives of this Plan should be the achievement of Job/Housing balance.
169. This comment is related to the RMP and is responded to in the RMP/RMP FEIR.
170. The USC-Planning Institute has prepared a report on the region's urban form which is included in the GMP as Appendix 3. Local design and architectural form should be addressed by local jurisdictions.

SIERRA CLUB
STEPHAN KAUFMAN (12/15/88)

174. While J/H balance performance goals are to be developed in 5 year increments, progress in meeting subregional goals will be monitored on an yearly basis. In addition, local jurisdiction's adoption of measures and ordinances that foster J/H balance is targeted for January 1, 1990.

175. A growth control contingency analysis has been prepared by the Planning Institute--U.S.C. and included in the GMP as Appendix 6.

The open space policy is identified in Chapter III of the GMP. Greater discussion of the regional open space policy is presented in Appendix 5. As a policy, the GMP supports the policies identified in SCAG's Conservation and Open Space Plan.

CAROLYN WOOD - LAGUNA BEACH (12/15/88)

177. While there is no guarantee that people will live near their work, the Plan provides the opportunity people to live near their place of work. SCAG will continue to refine the definition of Job/Housing balance.

CITY OF LONG BEACH
ROBERT PATERNOSTER (12/15/88)

- 186-188. SCAG agrees with comments. SCAG proposes to create: A task force to further analyze the policies of the GMP; a management information system; and a mechanism for establishing a coalition of jurisdictions. These recommendations are major themes of SCAG's upcoming Overall Work Program.
189. SCAG agrees with this comment. The GMP attempts to accelerate the natural trend towards J/H balance.

THE IRVINE COMPANY
TOM NIELSEN (12/14/88)

198. The Irvine Company and other private interest groups will have the opportunity to participate in the J/H balance implementation process through established subregional entities.

APPENDIX II. TRANSCRIPT AND RELATED DOCUMENTS FROM THE PUBLIC HEARING
ON THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE GROWTH
MANAGEMENT PLAN HELD ON FEBRUARY 2, 1989

BEFORE THE
SOUTHERN CALIFORNIA ASSOCIATION OF
GOVERNMENTS

IN THE MATTER OF THE:)
)
GROWTH MANAGEMENT PLAN)
AND REGIONAL MOBILITY PLAN)
FEBRUARY 1989)
_____)

DATE AND TIME: THURSDAY, FEBRUARY 2, 1989, 10:25 A.M.

PLACE: MAIN CONFERENCE ROOM
600 SOUTH COMMONWEALTH AVENUE
LOS ANGELES, CALIFORNIA

REPORTER: SHANNON M. ROSS
SHORTHAND REPORTER

Barristers'
reporting service

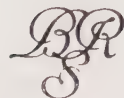
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MR. ELMER DIGNEO
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MR. LOU MORET
MR. COLIN LENNARD
MR. MARK PISANO
MS. CHRIS REED
MR. JOHN MIKELS
MS. JUDY NIEBURGER
MR. JOHN FLYNN
MR. JOHN MELTON
MR. FRANK MCDEVITT
MR. CLARENCE SMITH
MS. JUDY WRIGHT
MR. ROBERT WAGNER

STAFF PRESENT

MS. SHEILA STEWART

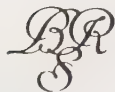


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FEBRUARY 2, 1989, 10:42 A.M.

CHAIRMAN GRIFFIN: I'LL OFFICIALLY OPEN THE MEETING. WE'LL GET STARTED. WE NOW HAVE A QUORUM. THE STARTING TIME IS 10:42. AND IN OUR TRADITIONAL WAY, WE'LL HAVE SELF-INTRODUCTIONS, AND WE'LL GO AROUND THE TABLE WITH THAT.

I'M DON GRIFFIN, THE PRESIDENT OF SCAG. I'M THE COUNCILMEMBER OF THE CITY OF BUENA PARK, AND I'M THE DELEGATE REPRESENTING THE MEMBER CITIES FROM ORANGE COUNTY.

AND TO MY LEFT IS JOHN MIKELS, SUPERVISOR FOR SAN DIEGO COUNTY. SHEILA STEWART, SCAG STAFF EXECUTIVE SECRETARY. JUDY NIEBURGER, CITY OF MORENO VALLEY. JOHN FLYNN, COUNTY SUPERVISOR, VENTURA. JOHN MELTON, COUNCILMAN REPRESENTING THE CITY OF SANTA PAULA.

CLARENCE SMITH, CITY COUNCILMEMBER. JUDY WRIGHT, CHAIR OF THE TRANSPORTATION AND COMMUNICATION. BOB WAGNER, COUNCILMAN FROM THE CITY OF LAKEWOOD AND MEMBER OF THE L.A. COUNTY BOARD.

FRANK HOTCHKISS, DIRECTOR OF REGIONAL STRATEGIC PLANNING AT SCAG. ARNOLD SHERWOOD, DIRECTOR OF PLANNING AND ECONOMIC DEVELOPMENT. ANNE BAKER, DIRECTOR OF ENVIRONMENTAL PLANNING.

TIM JOHNSON, COUNCILMAN FOR THE CITY OF

REDLANDS REPRESENTING CITIES OF ORANGE. ELMER DIGNEO, MAYOR OF LOMA LINDA REPRESENTING -- ALTERNATE FOR THE CITIES OF SAN BERNARDINO.

PEGGY SARTOR, COUNCILMEMBER, SAN BERNARDINO COUNTY. GLORIA MOLINA, CITY COUNCILMEMBER FOR THE CITY OF LOS ANGELES. LOU MORET, CHIEF OPERATING OFFICER. COLIN LENNARD, GENERAL COUNSEL. MARK PISANO, EXECUTIVE DIRECTOR.

ALL RIGHT. WE HAVE NOW THE PUBLIC COMMENT PERIOD. I HAVE FOUR CARDS THAT HAVE BEEN FILLED OUT. THREE OF THOSE WHICH, I THINK, ARE APPROPRIATELY IDENTIFIED FOR THE PUBLIC HEARING THAT WE HAVE AS A PART OF OUR AGENDA THIS MORNING AND THAT HAS TO DO WITH THE GROWTH MANAGEMENT PLAN AND THE REGIONAL MOBILITY PLAN, WHICH WE'LL HEAR AS WE PROGRESS.

WELL, HERE WE HAVE ONE MORE, AND THAT'S UNDER THE REGIONAL MOBILITY PLAN. I DO HAVE ONE INDIVIDUAL, BOB GETTS, WHO WISHED TO SPEAK UNDER THE PUBLIC COMMENT PERIOD, WESTERN STATES PETROLEUM.

IF YOU WOULD, PLEASE, COME FORWARD. IDENTIFY YOURSELF; AND, IF YOU COULD, TRY TO HOLD YOUR REMARKS TO THREE MINUTES.

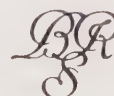
MR. GETTS: YES, SIR.

PRESIDENT GRIFFIN, MEMBERS OF THE EXECUTIVE COMMITTEE, LADIES AND GENTLEMEN. I AM BOB GETTS, THE



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ASSISTANT EXECUTIVE DIRECTOR --

CHAIRMAN GRIFFIN: IS THERE A SWITCH ON THAT
MIKE?

MR. GETTS: CAN YOU HEAR ME NOW? IF NOT, I'LL
SPEAK LOUDER.

CHAIRMAN GRIFFIN: IF YOU WOULD.

MR. GETTS: I'LL SPEAK A LITTLE LOUDER. IS THIS
PRETTY GOOD? OKAY.

CHAIRMAN GRIFFIN: THANK YOU VERY MUCH.

MR. GETTS: I'M BOB GETTS, THE ASSISTANT
EXECUTIVE DIRECTOR OF THE WESTERN STATES PETROLEUM
ASSOCIATION, WHICH UNTIL JANUARY 1ST WAS CALLED THE
WESTERN OIL AND GAS ASSOCIATION OR WOGA. WE HAD A NAME
CHANGE ON JANUARY 1ST, BUT ESSENTIALLY THE ORGANIZATION
IS THE SAME ONE.

WE WERE PLEASED TO BE ABLE TO APPEAR BEFORE
YOU ON DECEMBER THE 15TH TO ADDRESS THE PROPOSED AIR
QUALITY MANAGEMENT PLAN. AND AT THAT TIME, YOU MAY
RECALL, THAT WE HAD ANNOUNCED AN ALTERNATIVE IDEA WHICH
WE FEEL OFFERS A MORE HEALTHFUL AIR PLAN WITHOUT MANY OF
THE SOCIOECONOMIC DISRUPTIONS WHICH A LOT OF EXPERTS
PREDICT MAY OCCUR UNDER THE CURRENT PROPOSED PLAN.

WITH REGARD TO THE ISSUE OF SOCIOECONOMICS,
OUR PEOPLE WHO ATTENDED YOUR WORKSHOP ON TUESDAY WANTED
TO EXTEND THEIR CONGRATULATIONS TO WHAT THEY FELT WAS A

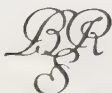
1 VERY EXCELLENT WORKSHOP. AND WE WERE VERY PLEASED THAT
2 SUCH A WORKSHOP COULD, IN FACT, BE HELD. AND SOME OF OUR
3 REPRESENTATIVES WERE, IN FACT, PARTICIPANTS IN THAT.

4 SINCE WE PRESENTED OUR STATEMENT ON
5 DECEMBER THE 15TH, THERE HAVE BEEN SOME IMPORTANT
6 QUESTIONS RAISED IN THE PUBLIC ABOUT OUR ALTERNATIVE, AND
7 WE WOULD LIKE TO TAKE THIS BRIEF OPPORTUNITY TO CLARIFY
8 JUST A COUPLE OF THOSE FOR YOU BECAUSE WE DO FEEL THEY
9 WERE VERY IMPORTANT, AND WE DON'T WANT ANY
10 MISUNDERSTANDINGS TO BE EXISTING ON OUR PROPOSAL.

11 THERE, APPARENTLY, HAS BEEN SOME
12 MISUNDERSTANDING ABOUT OUR PLAN BEING DIRECTED REALLY
13 SOLELY AT OZONE, REDUCING OZONE AND LITERALLY IGNORING
14 THE OTHER POLLUTANTS THAT FACE THIS AREA.

15 THAT IS NOT THE CASE AT ALL. NOW AS I
16 INDICATED EARLIER, OUR PLAN DOES OFFER A VERY AGGRESSIVE
17 PROGRAM AT REDUCING OZONE. AND THAT IS BECAUSE MANY
18 EXPERTS BELIEVE THAT OZONE IS TRULY ONE OF THE MOST
19 HEALTH RISK FACTORS FACING THIS AREA; SO, CONSEQUENTLY,
20 WE FEEL THAT IT IS THE POLLUTANT THAT SHOULD BE ADDRESSED
21 VERY, VERY HARD FIRST. BUT THAT DOESN'T MEAN THAT WE ARE
22 IGNORING NOX OR PM-10. OUR PLAN, IN FACT, ENVISIONS
23 MEETING THOSE STANDARDS AS WELL AND CARBON MONOXIDE.

24 NOW, THE KEY, I THINK -- THE KEY QUESTION
25 IN OUR ASSOCIATION RIGHT NOW IS THE PM-10 QUESTION.



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1 WE'RE DOING SOME ADDITIONAL WORK USING THE DISTRICT MODEL
 2 AND DATA TO DETERMINE WHERE SOME ADJUSTMENTS HAVE TO BE
 3 MADE IN OUR PROPOSAL TO ACTUALLY REACH OR ATTAIN THE
 4 STANDARDS FOR PM-10. AND OUR ASSOCIATION HAS INDICATED
 5 THAT IT IS PREPARED TO MAKE THE ADJUSTMENTS THAT ARE
 6 GOING TO BE NECESSARY TO BRING THAT PLAN INTO COMPLIANCE
 7 ON THE PM-10 STANDARD. AND THAT MAY MEAN INCLUDING IN
 8 OUR PROPOSAL SOME ADDITIONAL NOX PROVISIONS THAT WE, UP
 9 TO NOW, HAVE SUGGESTED BE DEFERRED.

0 ANOTHER AREA THAT WE FEEL NEEDS SOME
 1 CLARIFICATION IS THE AREA OF OUR RECOMMENDATIONS ON
 2 MOBILE SOURCES. IN OUR PLAN WE SUGGEST THAT MOBILE
 3 SOURCES BE FACED WITH SOME ADDITIONAL CONTROLS. WE FEEL
 4 THAT MOBILE SOURCES CONTINUE TO BE ONE OF THE MAJOR
 5 SOURCES OF OZONE, AND WE HAVE RECOMMENDED MEASURES THAT
 6 WOULD REDUCE TAILPIPE AND EVAPORATIVE EMISSIONS AND
 7 EXTEND REQUIREMENTS FOR MEETING EMISSIONS STANDARDS ON
 8 TRUCKS AND AUTOMOBILES.

9 NOW, THERE ARE JUST THREE THINGS THAT WE
 0 FEEL ARE VERY IMPORTANT WHEN WE TALK ABOUT AUTOMOTIVE
 1 CONTROLS. THE FIRST THING IS THAT WHEN WE TALK ABOUT
 2 IMPROVING THE EMISSIONS CONTROLS ON AUTOS, WE ARE NOT
 3 JUST TALKING ABOUT THE AUTOMOBILE ENGINE AND THE MACHINE,
 4 WE ARE TALKING ABOUT ALSO THE NEED TO CHANGE THE
 5 FORMULATION OF THE FUELS, THE GASOLINE, THE DIESEL,

1 WHATEVER.

2 WE ALSO ARE RECOMMENDING THESE CHANGES, NOT
 3 TOMORROW, BUT IN A TIME PERIOD THAT REALLY RANGES FROM
 4 ABOUT MID-1990S THROUGH THE VERY LATE '90S AND INTO THE
 5 YEAR 2000, SO THAT SHOULD PROVIDE SOME ADEQUATE AMOUNT OF
 6 TIME FOR KNOWN TECHNOLOGY TO BE PERFECTED AND
 7 IMPLEMENTED. AND WE ARE TALKING ABOUT KNOWN TECHNOLOGY.

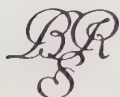
8 THIRDLY, WE HAVE HAD OUTSIDE EXPERTS REVIEW
 9 THE SUGGESTIONS, AND THEY BELIEVE THAT THEY ARE
 10 REALISTIC.

11 CHAIRMAN GRIFFIN: MR. GETTS, WE HAVE BEEN FIVE
 12 MINUTES NOW --

13 MR. GETTS: WELL, I WILL WRAP UP AND SAY THANK
 14 YOU FOR --

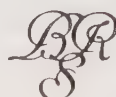
15 CHAIRMAN GRIFFIN: THE SUBJECT THAT YOU'RE
 16 TALKING, THE AQMP, WILL BE THE SUBJECT OF A PUBLIC
 17 HEARING ON MARCH 17TH. THE AQMP IS NOT A SUBJECT OF THE
 18 AGENDA FOR SCAG TODAY. WE WANTED TO HEAR WHAT YOU HAD TO
 19 SAY, AND WE DO WANT TO HEAR FROM YOU; HOWEVER, I THINK
 20 THE APPROPRIATENESS WOULD BETTER FIT, IF YOU WILL, MARCH
 21 17TH UNLESS THERE'S SOMETHING ELSE THAT YOU
 22 COULD -- IF YOU FEEL THERE'S SOMETHING ELSE THAT IS
 23 DIRECTLY GERMANE TO WHAT WE ARE GOING TO TALK ABOUT
 24 TODAY, I'D BE HAPPY TO CONCLUDE RIGHT NOW.

25 MR. GETTS: ALL RIGHT. I DO WANT TO THANK YOU.



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1 THE REASON WE THOUGHT WE WANTED TO CLARIFY THESE POINTS,
2 PRESIDENT GRIFFIN, IS WE, OF COURSE, ARE WELL AWARE YOUR
3 MEMBERS HAVE BEEN VERY ACTIVE AND CONCERNED ABOUT THIS
4 ISSUE. WE DIDN'T WANT TO LEAVE ANY MISUNDERSTANDINGS
5 FROM WHAT WE MAY HAVE ADDRESSED ON THE 15TH, AND WE FELT
6 IT WAS FAIR THAT THESE CLARIFICATIONS BE MADE. AND WE
7 WANT TO THANK YOU FOR THIS OPPORTUNITY TO DO SO.

8 CHAIRMAN GRIFFIN: WELL, REAL FINE. WE STILL
9 HAVE STAFF THAT YOU CAN TALK WITH ALSO.

10 MR. GETTS: THEY'VE BEEN VERY HELPFUL, AND WE
11 THANK THEM.

12 CHAIRMAN GRIFFIN: ALL RIGHT. FINE. APPRECIATE
13 IT VERY MUCH.

14 ALL RIGHT. THAT CONCLUDES THE ITEMS FOR
15 THE PUBLIC COMMENT PERIOD, AND WE WILL HAVE THOSE OTHERS
16 THAT HAVE REQUESTED TO BE HEARD COME UP LATER UNDER
17 SPECIFIC SUBJECTS OF THE AQMP AND GMP.

18 AND THOSE THAT HAVE NOT FILLED OUT A CARD
19 THAT WISH TO SPEAK ON THE PUBLIC HEARING ISSUES, I'D
20 PLEASE ENCOURAGE YOU TO FILL OUT YOUR CARDS NOW AND LEAVE
21 THEM UP ON THE -- MY LEFT -- MY LEFT, YOUR RIGHT -- THE
22 FRONT TABLE, AND WE'LL HAVE OUR SECRETARY PICK THOSE UP.

23 I'D NOW LIKE TO ASK MARK PISANO TO GIVE US
24 A REPORT ON THE COMMITTEE AND MEETING FOCUS.

25 MR. PISANO: THANK YOU, MR. PRESIDENT. GOOD

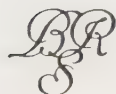
1 MORNING.

2 THE FOCUS OF THIS MEETING IS SCAG'S
3 INITIATION OF THE PLAN ADOPTION PROCESS. JUST A LITTLE
4 BACKGROUND. AT OUR DECEMBER 16TH MEETING WE TOOK THE
5 POSITION THAT WE WOULD NOT BE ADOPTING GROWTH -- GROWTH
6 MANAGEMENT, MOBILITY, LAND USE, TRANSPORTATION AND
7 ENERGY, CONSERVATION ELEMENTS OF AIR QUALITY PLAN.
8 RATHER, WE TOOK THE POSITION THAT WE WOULD DELAY ADOPTION
9 OF THE AIR QUALITY PLAN FOR 90 DAYS, AND WE WOULD DO THAT
10 IN CONJUNCTION WITH THE AIR QUALITY DISTRICT ON MARCH
11 17TH.

12 WE ALSO TOOK THE POSITION THAT WE WOULD
13 ALSO OPEN THE PUBLIC COMMENT PERIOD ON THE GROWTH
14 MANAGEMENT PLAN AND ON THE MOBILITY PLAN. THAT WE WOULD
15 CLOSE THE WRITTEN COMMENTS, AGAIN, ON JANUARY 16TH. AND
16 WE WOULD HAVE A PUBLIC HEARING ON FEBRUARY 2ND FOR ORAL
17 COMMENTS, AND THAT THE PLANS COULD BE POTENTIALLY ADOPTED
18 ON FEBRUARY 2ND.

19 THE ISSUE BEFORE THE EXECUTIVE COMMITTEE
20 TODAY IS, IN FACT, THE PUBLIC HEARING ON THE ADOPTION OF
21 THE GROWTH MANAGEMENT PLAN AND THE MOBILITY PLAN.

22 WE WOULD ALSO LIKE TO NOTE FOR THE
23 EXECUTIVE COMMITTEE THAT DEPENDING ON WHATEVER ACTION YOU
24 TAKE TODAY, THERE WOULD BE ANOTHER EXECUTIVE COMMITTEE
25 MEETING ON MARCH 2ND.



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1 AND, FINALLY, ON MARCH 17TH WE WILL HAVE A
2 JOINT HEARING WITH THE DISTRICT ON THE AIR QUALITY PLAN,
3 AND IT'S AT THAT DATE THAT THE EXECUTIVE COMMITTEE WILL
4 DECIDE WHAT PORTIONS OF WHATEVER PLAN YOU ADOPT IN THE
5 GROWTH MANAGEMENT AND IN MOBILITY THAT YOU INCLUDE IN THE
6 AIR QUALITY PLAN.

7 IT'S EXTREMELY IMPORTANT TO THE EXECUTIVE
8 COMMITTEE TO HAVE IT CLEAR IN MIND WHAT YOUR SCHEDULE IS,
9 AND ALSO WHAT THE PROCESS IS FOR ADOPTION. ON MARCH 17TH
10 YOU'LL MAKE THE DECISION AS TO WHAT PORTION OF THE
11 PLAN -- AND THERE CAN BE FLEXIBILITY BETWEEN WHAT YOU
12 ADOPT IN THE GROWTH PLAN AND THE MOBILITY PLAN AND WHAT
13 YOU INCORPORATE INTO THE AIR QUALITY PLAN.

14 SO THE FOCUS OF TODAY'S MEETING IS OUR
15 INITIATION OF OUR PLAN ADOPTION PROCESS UNDER THAT
16 SCHEDULE AND THAT PROVISION.

17 MS. SARTOR: ARE YOU SAYING THAT THE REGULAR
18 SCAG MEETING IS SCHEDULED FOR THE FIRST OF MARCH IN LIEU
19 OF THIS OR --

20 MR. PISANO: NO, WE WILL HAVE A REGULAR MEETING.
21 THE DATE IS THE 2ND OF MARCH. AND THEN WE WILL ALSO BE
22 HOLDING -- PARDON?

23 MS. SARTOR: IN ADDITION, WE WILL HAVE THIS --
24 THE MARCH 17TH HEARING?

25 MR. PISANO: WE WILL HAVE AN ADDITIONAL MEETING

1 ON MARCH 17TH. WE'LL HAVE TWO MEETINGS --

2 MR. SMITH: THAT WILL BE AT 10 O'CLOCK?

3 MR. PISANO: PARDON?

4 MR. SMITH: THAT WILL BE AT 10:00?

5 MR. PISANO: IT WILL BE 10:00 A.M. ON THE
6 17TH -- 9 O'CLOCK ON THE 17TH. AND IT WILL BE AT THE
7 CARSON CIVIC CENTER.

8 CHAIRMAN GRIFFIN: ALL RIGHT. THANK YOU, MARK.
9 ITEM 4 IS OUR CONSENT CALENDAR. WE HAVE A CORRECTION,
10 MARK, ON THE MINUTES OF THE LAST MEETING.

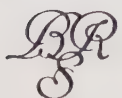
11 MR. PISANO: YES, I WOULD LIKE TO NOTE,
12 PRESIDENT GRIFFIN, THAT ON PAGE 3 OF THE EXECUTIVE
13 COMMITTEE MEETING THAT THE TITLE -- (INAUDIBLE)

14 REPORTER: EXCUSE ME. COULD YOU SPEAK UP. WE
15 DON'T HAVE MICROPHONES. THANK YOU.

16 CHAIRMAN GRIFFIN: THE COMMENT WAS THAT THE
17 CORRECTION ON THE MINUTES OF OUR LAST MEETING, PAGE 3 OF
18 OUR AGENDA SHOWS AND SHOULD BE CORRECTED TO SHOW BRUCE
19 NESTEANDE AS FORMER SUPERVISOR OF ORANGE COUNTY.

20 ALL RIGHT. ANYTHING FURTHER? ANY FURTHER
21 CORRECTIONS? ANY ADDITIONS OR CORRECTIONS? IF NONE,
22 THEN I'LL SHOW -- LET THE RECORD SHOW THE MINUTES STAND
23 APPROVED AS CORRECTED.

24 I ENTERTAIN A MOTION THEN TO APPROVE THE
25 BALANCE OF CONSENT CALENDAR ITEMS 4-B, C, AND D.



MR. DIGNEO: MOVED.

CHAIRMAN GRIFFIN: ALL RIGHT. DISCUSSION? ANY
OBJECTIONS TO THAT MOTION? NO OBJECTIONS. THAT WILL
STAND APPROVED.

WE ARE NOW THEN ON ITEM 5, WHICH IS A CALL
TO ACTION. AND WE WILL TAKE THIS IN PROGRESSION AS
FOLLOWS: WE WILL HAVE OUR STAFF REVIEW AND GIVE US A
BRIEF SUMMARY OF BOTH THE GMP AND RMP. AND THEN WE WILL
HAVE AN OPEN -- OPEN THE PUBLIC HEARING AFTER THE OPENING
OF THE -- AND THE TESTIMONY. WE'LL THEN HAVE STAFF TO
REVIEW AND MAKE COMMENTS AND ADDRESS THE ISSUES RAISED.
AND THEN AT THE CONCLUSION OF THAT, IT WILL BE THE
PLEASURE OF THIS EXECUTIVE COMMITTEE TO MAKE AN
APPROPRIATE MOTION.

THE DISCUSSIONS THAT WE'LL HAVE WILL BE
ADDRESSED INDIVIDUALLY TO THE GMP AND THEN THE RMP. I'D
LIKE TO EMPHASIZE TO ALL OF YOU THAT THE PUBLIC HEARING
WILL BE FOR BOTH OF THOSE PLANS.

SO WE'LL PROCEED AHEAD. AND I'LL ASK
FIRST, MARK, WOULD YOU LIKE TO MAKE ANY COMMENTS BEFORE
WE GO INTO THE GMP AND ASK ARNIE SHERWOOD TO COMMENT.

MR. PISANO: THE ONLY COMMENTS THAT I'D LIKE TO
MAKE TO THE EXECUTIVE COMMITTEE IS THAT SUBSEQUENT TO OUR
LAST MEETING WE HAVE RECEIVED ALL THE WRITTEN COMMENTS,
RESPONDED TO THEM, AND YOU HAVE THE RESPONSES TO THEM IN

YOUR PACKETS.

STAFF WILL BE READY TODAY -- WILL BE
ORGANIZED TODAY FOR ANY ADDITIONAL ORAL COMMENTS. WE'VE
SO ARRANGED THE STAFF SO THAT WE CAN NOW DO ANALYSIS AND
PROVIDE YOU WITH OUR RESPONSES TO THOSE QUESTIONS.

TODAY WE WILL START OFF, MR. PRESIDENT,
WITH ARNIE MAKING A PRESENTATION ON THE GROWTH MANAGEMENT
PLAN.

CHAIRMAN GRIFFIN: GOOD MORNING, ARNIE. GO
AHEAD.

MR. SHERWOOD: GOOD MORNING, MR. GRIFFIN,
MEMBERS OF THE EXECUTIVE COMMITTEE.

IT'S BEEN A LONG PROCESS. I PUT UP A CHART
ON THE -- OVER THERE NEXT TO LOU MORET ON THE DEVELOPMENT
OF THE GROWTH MANAGEMENT PLAN.

AND JUST TO RECALL, WE STARTED THIS WITH A
BASELINE IN AUGUST OF 1986. AND YOU HAD A PRELIMINARY
DRAFT BASED ON CONSULTANT REPORTS IN APRIL OF 1988. WE
CAME OUT WITH THE DRAFT GROWTH MANAGEMENT PLAN IN JULY OF
1988. THE DRAFT EIR WAS PRODUCED BY SEPTEMBER OF 1988,
AND WE HAD SOME PROPOSED FINAL CHANGES TO YOU IN
DECEMBER.

SINCE WE CONTINUED THE PUBLIC HEARING TILL
NOW, WHAT I WANTED TO REVIEW WERE THE MAJOR ISSUES THAT
HAVE BEEN RAISED IN THE PUBLIC HEARINGS AND THE PUBLIC



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COMMENTS ON THE DRAFT GROWTH MANAGEMENT PLAN, AND THE RESPONSES WE HAD TO THEM AND THE CHANGES WE HAVE MADE IN THE PLAN TO THOSE.

THE FIRST ISSUE OF -- MAJOR ISSUE THAT I'D LIKE TO ADDRESS IS THE ISSUE OF JOB/HOUSING BALANCE. WE RECEIVED MANY COMMENTS ON THIS IDEA AND THE WAY IT WAS TREATED. TWO MAJOR COMMENTS WERE THAT THE JOB/HOUSING BALANCE POLICY AS DRAFTED IN THE PLAN WAS FELT TO BE TOO RIGID FOR LOCAL GOVERNMENT, THE ABSOLUTE NUMBER OF JOBS AND THE ABSOLUTE NUMBER OF HOUSING UNITS. AND IT WAS ALSO PERCEIVED AS A THREAT TO LOCAL GOVERNMENTS AUTONOMY.

IN REVIEWING THAT, WE LOOKED AT WHAT WE WERE TRYING TO ACCOMPLISH THROUGH THE JOB/HOUSING BALANCE POLICY. THAT, AS YOU MAY RECALL, WAS TO PRIMARILY IMPROVE THE CONGESTION IN THE REGION AND IMPROVE AIR QUALITY. THAT'S THE REASON WE UNDERTOOK THE JOB/HOUSING BALANCE POLICY. IN ANALYZING IT, HOWEVER, WE FOUND THAT THE KEY INGREDIENT IN MAKING THAT IMPROVEMENT WAS THE RATIO OF JOBS TO HOUSING AND NOT THE ABSOLUTE NUMBERS.

SO ONE CHANGE THAT WE HAVE PROPOSED IN THE PLAN IS THAT IN MONITORING THE IMPLEMENTATION OF THE PLAN THAT THE PERFORMANCE TARGET SHOULD BE THE RATIO OF JOBS AND HOUSING IN EACH OF THE SUBREGIONS RATHER THAN THE ABSOLUTE NUMBERS. OF COURSE, THE ABSOLUTE NUMBERS ARE EXTREMELY IMPORTANT BECAUSE WE WILL CONTINUE TO USE THOSE

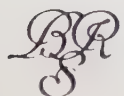
FOR SIZING INFRASTRUCTURE IN THE REGION.

ON LOCAL GOVERNMENT IMPLEMENTATION -- ON THE ISSUE OF IMPLEMENTATION, WE HAVE ADDED LANGUAGE TO MAKE CLEARER THAT IT IS LOCAL GOVERNMENT THAT HAS THE AUTONOMY AND THE CURRENT POWERS TO IMPLEMENT THIS POLICY TO CLEAR UP ANY CONFUSION IN THAT AREA.

ANOTHER MAJOR ISSUE THAT WAS BROUGHT OUT WAS THAT THE PLAN WAS CALLING FOR NEW AUTHORITIES AND NEW LEGISLATION. FOR EXAMPLE, TAX BASE SHARING AND OTHER LEGISLATION THAT WOULD AFFECT LOCAL GOVERNMENT. JUST LIKE TO -- WE DID NOT MAKE ANY CHANGES IN THE PLAN ON THIS, I JUST WANT TO POINT OUT THAT THAT IS NOT IN THE PLAN.

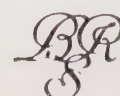
WHAT WE HAD WAS IN DEVELOPING THE GROWTH MANAGEMENT PLAN THE ISSUE PAPERS THAT WERE BROUGHT TO YOUR ATTENTION THAT WE HAD CONSULTANTS DO BACK IN MARCH AND APRIL OF LAST YEAR, DID LOOK AT OPTIONS AND SCENARIOS FOR GROWTH MANAGEMENT, AND AMONG THOSE OPTIONS AND SCENARIOS WERE SUCH THINGS AS TAX-BASE SHARING; HOWEVER, NONE OF THOSE HAVE BEEN INCLUDED IN THE PLAN. THE PLAN RELIES ON CURRENT AUTHORITIES AND CURRENT LEGISLATION. WE DID, HOWEVER, INCLUDE ALL THOSE CONSULTANT REPORTS AS APPENDICES TO THE PLAN.

ANOTHER MAJOR ISSUE RAISED WAS THE MITIGATION OF THIS GROWTH MANAGEMENT PLAN. THAT THERE



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WERE A NUMBER OF POLICIES THAT SHOULD BE ADDED, AND WE AGREED. AND WHAT WE HAVE DONE IS TAKEN THE MAJOR MITIGATION MEASURES IN THE EIR AND INCLUDED THEM IN A POLICY CHAPTER.

WE HAVE ALSO TAKEN ALL THE MITIGATION MEASURES THAT WERE IN THE EIR AND INCLUDED THEM IN A CHAPTER OF THE GROWTH MANAGEMENT PLAN. AND JUST A NOTE UNDER -- YOU'LL HEAR LATER -- UNDER THE FORTESE LEGISLATION, WE ARE REQUIRED TO MONITOR THOSE MITIGATION MEASURES THAT ARE IN THE EIR.

WE DID RECEIVE A FEW COMMENTS ON THE NUMBERS THEMSELVES. TWO, IN PARTICULAR, I'D LIKE TO BRING TO YOUR ATTENTION. ONE WAS THE COMMENT MADE BY NUMEROUS -- SEVERAL PEOPLE IN ORANGE COUNTY, INCLUDING THE COUNTY ITSELF, THAT ARE IN DEVELOPING OUR JOB/HOUSING BALANCE FOR THE COUNTY, THAT THE KEY ISSUE THERE WAS NOT THE NUMBER OF JOBS TO HOUSING BUT THE WORKERS PER HOUSEHOLD. THEY FELT THEY HAD A HIGHER NUMBER OF WORKERS PER HOUSEHOLD IN ORANGE COUNTY THAN THE REGION AS A WHOLE. WE LOOKED INTO THAT. IT DOES HAVE SOME MERIT. THEY DO HAVE A HIGHER RATIO OF WORKERS TO HOUSEHOLD, SO WE DID MAKE THAT ADJUSTMENT IN THE NUMBER OF JOBS IN ORANGE COUNTY. ABOUT 27,000 WERE ADDED TO ORANGE COUNTY; HOWEVER, IT STILL REMAINS THAT IF THE JOB/HOUSING BALANCE POLICY IN ORANGE COUNTY IS SUBSTANTIALLY THE WAY IT WAS,

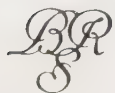
THIS IS AN ADJUSTMENT THAT DOES NOT APPRECIABLY CHANGE THE POLICY OR AFFECT THE FINDINGS OF THE EIR OR MAKE SIGNIFICANT CHANGES.

SIMILARLY WITH COMMENTS FROM SAN BERNARDINO COUNTY, THAT OUR NUMBERS OF BOTH EMPLOYMENT, HOUSING, AND POPULATION WERE TOO HIGH IN THE SAN BERNARDINO FOREST AREA. WE DID AGREE WITH THOSE COMMENTS, AND WE HAVE MADE SOME ADJUSTMENTS TO THOSE NUMBERS. ALSO, AGAIN, THE NUMBERS WERE -- THE CHANGES WERE SMALL INSOFAR AS THE IMPACTS ON THE EIR.

A FINAL MAJOR ISSUE THAT WAS RAISED WAS THE ISSUE OF THE DEPARTMENT OF FINANCE FORECAST, WHICH IS A MILLION LOWER THAN THE SCAG FORECAST FOR THE REGION, THAT WE DID NOT ADEQUATELY EXPLAIN THAT. WE HAVE ADDED LANGUAGE IN THE PLAN TO EXPLAIN THE DIFFERENCES IN ASSUMPTIONS AND METHODOLOGY THAT ACCOUNT FOR THAT DIFFERENCE.

I DO WANT TO NOTE THAT WE DID ADD A LOW ALTERNATIVE BASED ON THE DEPARTMENT OF FINANCE NUMBERS TO THE PLAN IN SEPTEMBER AND THAT WAS ANALYZED IN THE EIR.

THAT CONCLUDES MY DISCUSSION OF THE MAJOR ISSUES AND THE CHANGES THAT WE'VE MADE TO THE PLAN -- OR THE DRAFT PLAN. AGAIN, I WANT TO JUST NOTE THAT THERE WERE NO -- BASED ON THE CHANGES WE HAVE MADE -- THERE WERE NO SIGNIFICANT CHANGES MADE TO THE EIR.



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1 CHAIRMAN GRIFFIN: ALL RIGHT. ARE THERE ANY
2 QUESTIONS OF ARNIE SHERWOOD?

3 YES, CHRIS.

4 MS. REED: ARE YOU ADJUSTING THE NUMBER OF -- OR
5 RECOGNIZING THE COMMENT THAT THE NUMBER OF WORKERS PER
6 HOUSEHOLD IS SLIGHTLY HIGHER IN ORANGE COUNTY THAN THE
7 REGIONAL AVERAGE? DOES IT FOLLOW, THEN, THAT THEY HAVE A
8 LOWER PROPORTION OF RETIRED PEOPLE THAN THE REGIONAL
9 AVERAGE, IS THAT WHERE THE BALANCE COMES IN?

10 MR. SHERWOOD: THEY HAVE MORE PROBABLY BECAUSE
11 OF THE HIGHER HOME PRICES. THEY HAVE -- AMONG OTHER
12 FACTORS, THEY HAVE TO HAVE MORE PEOPLE WORKING PER
13 HOUSEHOLD, MORE TWO-PERSON WORKER HOUSEHOLDS.

14 IN L.A. COUNTY, FOR EXAMPLE, WE HAVE SOME
15 LARGER HOUSEHOLDS WHERE IT'S NOT POSSIBLE FOR THE WIFE TO
16 WORK. BUT I JUST WANTED TO INDICATE ON THAT ISSUE, WE
17 LOOKED AT AN ANALYSIS OF WHAT THAT MEANT FOR COMMUTING
18 PATTERNS, AND WE DID SEE THAT THAT CAUSED AN ADDITIONAL
19 COMMUTE INTO L.A. COUNTY. AND WE WANT TO REDUCE THAT.

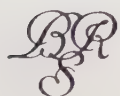
20 MS. SARTOR: I'D LIKE TO ASK A QUESTION, BUT I
21 HAVE TO PREFACE IT A LITTLE BIT. AS EVERYBODY IS AWARE,
22 BOTH GEORGE AIR FORCE BASE IN VICTORVILLE AND NORTON IN
23 SAN BERNARDINO ARE PROPOSED FOR CLOSURE. I PERSONALLY
24 THINK WE STILL HAVE A HOPE ON GEORGE; I'M NOT SURE ABOUT
25 NORTON. BUT YESTERDAY AT STEINBECK (PHONETIC) WE HAD A

1 PRESENTATION FROM A CONSULTANT, A GUY NAMED HUSING
2 (PHONETIC), WHO PROCLAIMED THAT THE ONLY SOLUTION -- THE
3 ONLY SURVIVAL THAT HE COULD SEE IN THE IMMEDIATE FUTURE
4 IN THE NEXT SEVERAL YEARS WAS INCREASING COMMUTERS. FOR
5 THE VICTORVILLE AREA, IT WILL BE SOMETHING LIKE 5,800
6 ADDITIONAL COMMUTERS ADDED TO OUR APPROXIMATELY 50
7 PERCENT COMMUTERS NOW, WHICH CERTAINLY ADDS TO
8 CONGESTION, TO AIR POLLUTION, AND TO OTHER PROBLEMS, AND
9 IT CERTAINLY THROWS OUR JOB/HOUSING BALANCE OUT.

10 RECOGNIZING THAT THIS WAS NOT OF OUR
11 MAKING, BUT WE PROBABLY WILL HAVE TO LIVE WITH IT, MY
12 QUESTION IS: IS THAT GOING TO HAVE ANY EFFECT ON THE
13 ADOPTION OF THE PLAN, PARTICULARLY, FOR THOSE OF US WHO
14 HAVE BEEN WARNED THAT THIS IS GOING TO HAPPEN?

15 MR. SHERWOOD: I GUESS I WOULD SAY TWO THINGS --
16 THREE THINGS, COUNCILWOMAN SARTOR. ONE, IT, OBVIOUSLY,
17 WILL HAVE AN IMPACT IN THE IMMEDIATE FUTURE, AND WE NEED
18 TO TAKE ACCOUNT OF THAT FOR 2010. WE'RE HOPEFUL THAT IT
19 WILL NOT HAVE THE LONG-RANGE IMPACT, THAT WE WILL BE ABLE
20 TO FIND OTHER EMPLOYERS THAT WILL GO INTO THAT AREA; AND,
21 I THINK, WE WANT TO WORK WITH COUNTIES AND CITIES TO THAT
22 END, AND WE ARE ALREADY STARTING TO HAVE CONVERSATIONS ON
23 THAT.

24 AND THIRDLY, THAT, I THINK, WHAT WE HOPE TO
25 DO IS ESTABLISH TASK FORCES TO LOOK AT GROWTH MANAGEMENT



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1 AND TRANSPORTATION ISSUES AND SOCIOECONOMIC ISSUES, AND
2 THAT IF THERE ARE ANY MAJOR CHANGES AS A RESULT OF
3 FURTHER ANALYSIS THAT WE SEE THAT REQUIRE A CHANGE IN THE
4 REGIONAL PLANS, THEN WE CAN PROPOSE THOSE LATER.

5 MS. SARTOR: MAY I MAKE ONE FURTHER COMMENT?
6 BASED ON MY EXPERIENCE TODAY, I THINK THE TRANSPORTATION
7 SITUATION, THE TRAFFIC BETWEEN VICTORVILLE AND LOS
8 ANGELES IS ALREADY SO BAD THAT IF IT GETS WORSE, I DON'T
9 SEE HOW WE ARE GOING TO CONTINUE TO OPERATE, TO GO TO THE
10 MEETINGS, TO DO THE THINGS THAT WE'RE DOING WHEN IT TAKES
11 TWICE AS LONG TO GET ANYWHERE.

12 ISN'T THAT GOING TO HAVE A TERRIFIC IMPACT
13 ON THE BUSINESS THAT WE WANT TO ACCOMPLISH?

14 MR. SHERWOOD: I THINK IT JUST HAPPENS THAT
15 IF THOSE CLOSE AND NOTHING ELSE HAPPENS, IT'S GOING TO
16 HAVE AN IMPACT. THERE'S NO QUESTION ABOUT IT. BUT THERE
17 ARE THINGS THAT CAN BE DONE TO MITIGATE THAT. AND AS I
18 SAY, I THINK WE WANT TO WORK WITH THE COUNTIES AND CITIES
19 AND CALTRANS, THE FEDERAL GOVERNMENT, THE STATE
20 GOVERNMENT TO SEE WHAT WE COULD DO. WE THINK THERE IS A
21 LOT OF POTENTIAL, ACTUALLY, FROM EMPLOYMENT MOVING INTO
22 THOSE AREAS TO MAKE UP FOR MILITARY.

23 CHAIRMAN GRIFFIN: JUDY?

24 MS. NIEBURGER: I KIND OF GO ALONG WITH WHAT
25 PEGGY WAS SAYING. I THINK THERE ARE A NUMBER OF PEOPLE

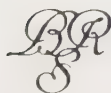
1 IN THE RIVERSIDE AREA THAT FEEL THAT THE NUMBERS ARE TOO
2 LOW, BOTH FOR HOUSING AND ALSO FOR THE JOBS. ARE THERE
3 GOING TO BE ANY KIND OF SANCTIONS, OR IS IT JUST GOING TO
4 BE A MATTER OF SCAG GOING BACK IN FIVE YEARS AND STUDYING
5 THE NUMBERS AGAIN?

6 MR. SHERWOOD: TWO THINGS. LET ME JUST ADD THAT
7 MOST OF THE JOBS AND HOUSING THAT WE TOOK OUT OF SAN
8 BERNARDINO, WE PUT IN YOUR AREA OF RIVERSIDE BECAUSE WE
9 FELT IT WAS TOO LOW.

10 SECONDLY, THIS PLAN DOES CALL FOR A
11 REVISITATION OF HOW WELL IT'S DOING, FOR A MAJOR RELOOK
12 IN FIVE YEARS; OF COURSE, WE'LL BE MONITORING IT YEARLY
13 TO SEE HOW IT'S EXACTLY APPEARING. AND IF RIVERSIDE GETS
14 MORE JOBS THAN WE'VE FORECASTED, THAT'S FINE.

15 THERE ARE NO SANCTIONS ON THAT THAT WE CAN
16 FORESEE BECAUSE THAT IS TO THE GOOD TO HAVE MORE JOBS IN
17 AN AREA THAT ALREADY HAS A LARGE EXCESS OF HOUSING.

18 MS. NIEBURGER: WELL, I THINK ALSO ACCORDING TO
19 WHAT PEGGY IS SAYING AND ALSO WHAT WE'VE BEEN TOLD IS
20 THAT MARCH AIR FORCE BASE IS GOING TO BE TAKING PEOPLE
21 FROM SAN BERNARDINO AND ALSO FROM VICTORVILLE AND OTHER
22 BASES. AND SO RIGHT AWAY THOSE NUMBERS ARE NOT GOING TO
23 BE IN THE BALLPARK BECAUSE WE'VE ADDED PROBABLY ANOTHER
24 15,000 PEOPLE. SO THAT WOULD BE MORE HOUSING, THAT WOULD
25 BE MORE POPULATION. AND SO DO YOU -- AND ALSO MY OTHER



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1 QUESTION IS: DO YOU COUNT GOVERNMENT JOBS IN WITH THE
2 JOBS -- THE JOB RATIO?

3 MR. SHERWOOD: WE COUNT ALL JOBS. THE ONLY
4 THING WE DON'T COUNT ARE MILITARY THAT ARE -- WE COUNT
5 THE CIVILIANS THAT WORK FOR THE MILITARY. WE DON'T COUNT
6 THE SOLDIERS.

7 MS. NIEBURGER: EVEN THOSE THAT -- THOSE
8 PEOPLE --

9 MR. SHERWOOD: WE DO -- WE DO COUNT THEM AND
10 THEIR EFFECT ON COMMUTING, ON THEIR IMPACT IN THE AREA.
11 WE DON'T COUNT THEM AS FAR AS JOB/HOUSING BALANCE RATIO.

12 MS. NIEBURGER: BUT AS FAR AS POPULATION?

13 MR. SHERWOOD: YES. WE PUT THEM IN THE
14 POPULATION.

15 MS. NIEBURGER: DOESN'T THAT THROW OFF YOUR
16 RATIO? IF YOU CONSIDER THEM AS PART OF THE HOUSING AND
17 POPULATION, DON'T YOU CONSIDER THEM AS PART OF THE JOB
18 MARKET?

19 MR. SHERWOOD: THAT'S A TECHNOLOGICAL POINT, BUT
20 WE DO REMOVE THEM FOR BOTH POPULATION AND JOBS WHEN WE
21 CALCULATE THE JOB/HOUSING RATIO. WE ALSO LOOK AT IT WITH
22 THEM INCLUDED. IT DOES NOT USUALLY ALTER THE SITUATION,
23 BUT IN SOME AREAS IT DOES MAKE A DIFFERENCE.

24 CHAIRMAN GRIFFIN: ALL RIGHT. TIM.

25 MR. JOHNSON: ARNIE, ON THIS EIR -- I THINK

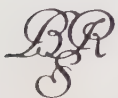
1 STAFF AND THE CONSULTANT HAVE DONE A VERY GOOD JOB ON
2 THE PLAN AND THE EIR WITHIN THE CONSTRAINTS OF THE
3 EXISTING AUTHORITIES AVAILABLE TO US. BUT IS A FAVORABLE
4 VOTE TO APPROVE THE EIR, IS THAT A STATEMENT THAT WE
5 BELIEVE THESE POPULATION FIGURES ARE SUSTAINABLE? AND
6 THE REASON WHY I ASK THAT IS, I AM ABSOLUTELY CONVINCED,
7 IN THE CASE OF WATER RESOURCES, THERE IS NO WAY TO
8 SUPPORT THESE POPULATION NUMBERS. SO IF I VOTE FOR THE
9 EIR, AM I SAYING THAT THIS CAN'T HAPPEN BECAUSE IT WILL
10 NOT BE ABLE TO?

11 MR. SHERWOOD: I THINK ONE OF THE THINGS THAT'S
12 IN THE EIR -- AMONG THE THINGS IN THE EIR, I SHOULD SAY,
13 ARE MITIGATION MEASURES, THINGS THAT WOULD HAVE TO BE
14 DONE TO MAKE THIS MORE ACCEPTABLE -- GROWTH MORE
15 ACCEPTABLE. AMONG THOSE ARE OUR WATER SUPPLY AND FLOOD
16 CONTROL AND A LOT OF OTHER THINGS SCHOOLS, POLICE, AND SO
17 ON.

18 MR. JOHNSON: WELL, I DON'T WANT TO GUM UP THE
19 WORKS BECAUSE I UNDERSTAND THE CONSTRAINTS WE LABOR
20 UNDER. MY CITY, FOR EXAMPLE, HAD DIFFERENCES WITH --
21 THAT THEY WILL NEVER BE ABLE TO RESOLVE WITH SCAG, BUT
22 THAT'S BECAUSE OF THE LEGISLATION.

23 MR. SHERWOOD: THAT WAS ON THE REGIONAL HOUSING
24 NEEDS ASSESSMENTS.

25 MR. JOHNSON: RIGHT. BUT IF WE DO NOT BELIEVE



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1 THERE IS A WAY TO MITIGATE ON THAT PARTICULAR NATURAL
2 RESOURCE, DOES THAT THEN REQUIRE ME TO VOTE NO ON THE
3 EIR?

4 MR. SHERWOOD: I THINK WHEN THE EIR IS
5 PRESENTED, THAT'S AN APPROPRIATE QUESTION TO DISCUSS WITH
6 THEM. BUT I THINK THAT OUR ASSUMPTION IN THIS PLAN IS
7 THAT THE MAJOR IMPACTS OF THOSE ARE MITIGABLE, BUT IT'S
8 GOING TO REQUIRE INFRASTRUCTURE AND SPENDING.

9 AND ONE OF THE THINGS THAT WE'RE REQUIRED
10 TO DO UNDER THE NEW LEGISLATION, NEW FORTSESE LEGISLATION,
11 IS MONITOR WHETHER THAT MITIGATION IS ACTUALLY OCCURRING,
12 SO YOU'LL HAVE A CHANCE TO REVISE THIS PLAN. I MEAN THIS
13 IS NOT CAST IN CONCRETE.

14 CHAIRMAN GRIFFIN: ANYTHING FURTHER? ANY
15 FURTHER QUESTIONS OF ARNIE?

16 MR. MIKELS: JUST FOLLOWING UP ON YOUR LAST
17 COMMENT, YOU INDICATED THAT IT WASN'T CAST IN CONCRETE.

18 IS THERE ANY REQUIREMENT FOR SOME SPECIFIC
19 AMOUNT OF TIME FOR WHICH -- OR IF IT WAS APPROVED, LET'S
20 SAY TODAY OR NEXT MONTH OR SIX MONTHS LATER WE NOTICE THE
21 IMPACT TRENDS THAT WERE ONLY EMERGING NOW OR DURING THE
22 DEVELOPMENT PROCESS OF THE PLAN ITSELF AND SAW THAT THE
23 PROJECTION OF THOSE TRENDS WOULD HAVE SOME HIGHLY
24 DIFFERENT END RESULTS FROM THOSE PROJECTED IN THE PLAN
25 ITSELF, THE EIR, WOULD WE BE ABLE TO AMEND IT THEN?



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1 MR. SHERWOOD: YES, YOU CAN.

2 CHAIRMAN GRIFFIN: ANY FURTHER QUESTIONS OF
3 ARNIE?

4 MS. MOLINA: I INITIALLY HAD THE SAME QUESTION.
5 THERE HAS TO BE FLEXIBILITY IN THE PLAN.

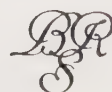
6 MR. SHERWOOD: EXACTLY.

7 MS. MOLINA: WE ARE ENTITLED TO MAKE
8 ADJUSTMENTS?

9 MR. SHERWOOD: ONE OF THE MAJOR CHANGES WE MADE
10 IN THE PLAN WAS TO ADD SOME FLEXIBILITY ON THE
11 JOB/HOUSING BALANCE.

12 MS. MOLINA: WE ARE GOING TO HAVE EVER-CHANGING
13 TRENDS IN LOS ANGELES. ONE OF THE THINGS IS WITH REGARD
14 TO JOB/HOUSING, AND SINCE I WASN'T INVOLVED IN THE
15 DEVELOPMENT OF THE PLAN, IN PARTICULAR THAT PROCESS, IS
16 AFFORDABILITY EVER PART OF ANY OF THESE -- ON THE
17 JOB/HOUSING BALANCE AND PROPOSALS, PARTICULARLY BEFORE
18 LOCAL JURISDICTIONS?

19 MR. SHERWOOD: AFFORDABILITY WAS A MAJOR PART OF
20 OUR REGIONAL HOUSING NEEDS ASSESSMENT PLAN, WHICH WAS
21 APPROVED IN JUNE BY THE EXECUTIVE COMMITTEE, AND THAT IS
22 SOMETHING THAT EVERY LOCAL JURISDICTION BY STATE LAW IS
23 REQUIRED TO ADDRESS. AND WE, IN THE REGIONAL HOUSING
24 NEEDS ASSESSMENT, DID HAVE AFFORDABILITY CRITERIA. WE
25 HAVE AN ASSESSMENT OF THE NEEDS -- CURRENT NEEDS OF ALL



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JURISDICTIONS AS WELL AS FUTURE NEEDS, AND A FAIR SHARE
ALLOCATION OF THOSE NEEDS.

MS. MOLINA: BUT I DIDN'T NOTICE IT WHEN YOU
TALKED ABOUT THE PLAN.

MR. SHERWOOD: THIS PLAN -- THERE'S A PART OF
THE PLAN THAT SAYS IT WILL BE BASED ON THE ALLOCATIONS
THAT ARE IN THE REGIONAL HOUSING NEEDS ASSESSMENT, SO IT
IS CONSISTENT WITH THAT.

MS. MOLINA: SO THAT ALLOCATION IS BASED ON THE
HOUSING PLAN?

MR. SHERWOOD: RIGHT.

MS. MOLINA: THANK YOU.

CHAIRMAN GRIFFIN: ANY FURTHER QUESTIONS OF
ARNIE? THANK YOU VERY MUCH, ARNIE.

THAT CONCLUDES THE PRESENTATION OF THE GMP.
AND WE WILL NOW ASK JIM GOSNELL TO COMMENCE WITH THE
PRESENTATION ON THE RMP, THE REGIONAL MOBILITY PLAN.

MR. GOSNELL: WE TOO STARTED A LONG TIME AGO. I
DIDN'T PREPARE A CHART FOR YOU, BUT I WAS JUST GOING TO
SAY WE STARTED THREE YEARS OR SO AGO.

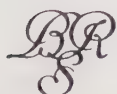
AND A LITTLE BIT OF HISTORY. YOU MAY
RECALL, WE ASKED LOCAL AGENCIES TO TELL US WHAT THEIR
PLANS WERE SO THAT WE COULD MATCH THEM UP AGAINST OUR
REVISED GROWTH PROJECTIONS, BASELINE, AND SUBSEQUENT
PROJECTIONS. WE ASKED THEM, "IF WE HAD ADDITIONAL MONEY,

WHAT WOULD YOU DO?" AND WE ANALYZED ALL OF THOSE,
LEADING TO THE CONCLUSION THAT THE CURRENT PROJECT, THE
PLANNING THAT WAS OCCURRING IN THE REGION, WAS GOING TO
BE INADEQUATE TO ADDRESS THE MOBILITY NEEDS THAT WE SAW
COMING IN THE NEXT 20 OR SO YEARS.

OUT OF THAT, WE DEVELOPED THE FOUR
SCENARIOS THAT YOU MIGHT RECALL. THAT INCLUDED:
FACILITIES, SYSTEM MANAGEMENT, DEMAND MANAGEMENT, AND IN
SOME CASES GROWTH MANAGEMENT THAT ARNIE WAS JUST TALKING
ABOUT.

YOU SELECTED STRATEGY III, AND TOLD US TO
DEVELOP A PLAN BASED ON STRATEGY III AT THAT TIME. WE
HAVE DONE SO. AND THE PLAN THAT WE ARE PRESENTING TODAY
IS THE CULMINATION OF THAT PROCESS, AND IT DOES MAINTAIN
THE BASIC STRUCTURE OF STRATEGY III.

THAT STRATEGY IS SAYING THAT WE NEED TO
MANAGE THE SYSTEM, THE TRANSPORTATION SYSTEM, AS
EFFECTIVELY AS POSSIBLE TO GET AS MUCH OUT OF IT AS WE
CAN. TO SHIFT THE WAY TRAVEL IS OCCURRING TO AND FROM
WORK OUT OF THE SINGLE-OCCUPANT AUTOMOBILE AND INTO
TRANSIT AND HIGH OCCUPANCY VEHICLES. SHIFT THE WAY
PEOPLE OR THE TIME THAT PEOPLE TRAVEL TO WORK, AND TRY TO
REDUCE OUR PEAK PERIOD DEMAND. TO BUILD FACILITIES, BOTH
THE HIGHWAYS AND TRANSIT, FOR THE HIGH OCCUPANCY VEHICLE.
RAISE MORE MONEY TO PAY FOR THOSE FACILITIES AND



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SERVICES, AND TO BETTER COORDINATE LAND USE AND
TRANSPORTATION DECISION MAKING.

IN DECEMBER YOU HAD BEFORE YOU THE COMMENTS
AND STAFF RECOMMENDATIONS ON CHANGES TO THE PLAN BASED ON
THE PUBLIC PROCESS TO THAT POINT. TODAY IN YOUR
ATTACHMENT, YOU HAVE THE ADDITIONAL COMMENTS THAT WE'VE
RECEIVED, THE RESPONSES, AND ANY ADDITIONAL CHANGES THAT
THE STAFF IS RECOMMENDING.

IN ADDITION, BECAUSE THE PUBLIC PROCESS
CONCLUDED JUST THE 31ST; EARLIER THIS WEEK, THERE'S AN
ADDENDUM IN FRONT OF YOU THAT INCLUDES SOME ADDITIONAL
COMMENTS THAT WE HAVE RECEIVED AS OF THE 31ST. AND
RELATIVE TO THE EIR, I BELIEVE, THERE'S A MEMO FROM THE
ENVIRONMENTAL STAFF WITH ONE MORE ADDITIONAL COMMENT.

NONE OF THE INPUT IN THE CHANGES THAT WE'VE
MADE HAVE RESULTED IN SIGNIFICANT CHANGES TO THE DRAFT
ENVIRONMENTAL IMPACT REPORT WHERE YOU WERE AT YOUR LAST
MEETING.

TURNING TO THE ATTACHMENT -- BEGINNING ON
PAGE 277 OF YOUR ATTACHMENTS, WE HAD IDENTIFIED THE KEY
ISSUES THAT HAVE BEEN GENERATED IN THE ENTIRE PLAN
PROCESS, AND I WANTED TO FOCUS ON A FEW OF THOSE FOR YOU.

ONE OF THE MORE FUNDAMENTAL ISSUES IS
THERE'S NOT ADEQUATE FUNDING TO PAY FOR ALL OF THE
IMPROVEMENTS AND SERVICES. WE RECOGNIZE THAT. WE'VE

DEVELOPED A PLAN TO RESPOND TO THE FUNDING SHORTFALL, IT
CALLS FOR A COMBINATION OF STRATEGIES AND ACTIONS:
RAISING THE GAS TAX, POSSIBLE SALES TAX, USER FEES,
CONCEIVABLY LOOKING AT CONGESTION OR PEAK PERIOD CHARGES
TO ASSIST IN PAYING FOR OUR TRANSPORTATION PLAN.

THE SHORTFALL IS MOST SIGNIFICANT IN
TRANSIT AND IN OUR DEMAND MANAGEMENT PROGRAM, AND WE'RE
GOING TO NEED TO DO CONTINUING WORK TO REFINE THE
FINANCIAL STRATEGIES TO PAY FOR THOSE PROGRAMS. WE
RECOGNIZE THAT IN ACTIONS AND SEQUENCING OF ACTIONS IN
THE PLAN.

ANOTHER ISSUE IS ON THE -- IN THE PLAN,
BECAUSE OF THE SHORTFALL, WE HAVE AN UNCONSTRAINED
PROGRAM. MEANING, WE DON'T HAVE A CLEARLY DEMARKED
FINANCIAL PLAN FOR IT. AND THE ISSUE IS COMMITMENTS TO
THOSE PROJECTS. AND WE BELIEVE WE RESPONDED TO THEM BY
NOTING THAT WE MUST GET THE ADDITIONAL FUNDING BEFORE WE
CAN REALLY COMMIT TO BUILDING THESE ADDITIONAL PROJECTS.
THESE THINGS GO HAND IN GLOVE. WITHOUT THE ADDITIONAL
FUNDING, WE RECOGNIZE WE WON'T BE ABLE TO BUILD ALL OF
THESE FACILITIES. AND WE WILL NEED TO MAKE ADJUSTMENTS
IN THE PLAN.

ANOTHER MAJOR ISSUE WAS IN THE TRANSIT AND
HIGH OCCUPANCY VEHICLE PROGRAM. WE HAD SUBSTANTIAL
SYSTEM EXPANSIONS IN BOTH. THERE WERE ISSUES RAISED



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1 WHERE WE WERE COMPETING BETWEEN THOSE TWO SYSTEMS AND
2 DUPLICATING.

3 WE HAVE MADE SUBSTANTIAL REVISIONS TO THE
4 TRANSIT PROGRAM TO BUILD UPON HIGH OCCUPANCY VEHICLE LANE
5 ADDITIONS THAT START OUT WITH THE BUS-ON-FREEWAY PROGRAM
6 WHERE THAT'S APPROPRIATE. WE'VE REDUCED SEPARATE
7 FACILITIES FOR OUR TRANSIT PROGRAM AND REDUCED THE
8 CAPITAL COSTS SUBSTANTIALLY IN RESPONSE TO THAT.

9 ANOTHER ISSUE, AND AN IMPORTANT ONE, IS
10 THERE IS SOME CONCERN THAT PARTICULARLY THAT THE REGIONAL
11 TRANSIT PROGRAM THAT WE'VE LAID OUT MAY NOT SUPPORT THE
12 JOB/HOUSING BALANCE THAT'S CALLED FOR IN THE GROWTH PLAN.
13 AS I MENTIONED, WE'VE SCALED DOWN SOME OF THE REGIONAL
14 TRANSIT. IN OUR OPINION, THE REGIONAL TRANSIT PROGRAM
15 WOULD NOT WORK COUNTER TO OUR POLICIES FOR JOB/HOUSING
16 BALANCE, BUT WOULD SUPPORT THE JOB/HOUSING BALANCE.

17 A VERY SUBSTANTIAL ISSUE IS THE DEMAND
18 MANAGEMENT PROGRAM ITSELF. AS YOU RECALL, WE HAVE A GOAL
19 OF REDUCING ABOUT THREE MILLION TRIPS, HOME-TO-WORK
20 TRIPS, OVER THE NEXT 20 YEARS FROM WHAT WE WOULD BE
21 PROJECTING OTHERWISE. THE ISSUE IS: WILL THE PROGRAM
22 THAT WE'VE LAID OUT PRODUCE THE RESULTS THAT ARE NEEDED? ,
23 WILL WE BE ABLE TO BE SUCCESSFUL TO HAVE A 20-PERCENT
24 REDUCTION OF HOME-TO-WORK TRIPS BY TELECOMMUTING, FOR
25 EXAMPLE?

1 WE'VE LAID OUT WHAT WE THINK IS A VERY
2 AGGRESSIVE PROGRAM. WE'VE SAID THESE ARE THE OBJECTIVES
3 THAT WE NEED TO SHOOT FOR. YOU NEED TO REALIZE THAT
4 THESE OBJECTIVES ARE BUILT INTO THE AIR QUALITY PLAN,
5 WHICH YOU'LL BE DISCUSSING NEXT MONTH. SO THEY'RE GOING
6 TO BE IMPORTANT TARGETS FOR US TO TRY TO ACHIEVE AS WELL
7 AS TRYING TO ACHIEVE THE MOBILITY TARGETS THAT YOU HAVE
8 SET FOR US AND GOALS THAT YOU'VE RECOMMENDED.

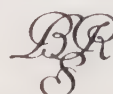
9 WE HAVE MAINTAINED THE TARGETS. WE'VE
10 PROVIDED ADDED FLEXIBILITY AND OPTIONS. WE'VE NOT
11 PRESCRIBED THAT THIS IS THE EXACT WAY THAT THE DEMAND
12 MANAGEMENT PROGRAM NEEDS TO BE EXECUTED, BUT WE'VE
13 IDENTIFIED THESE ARE THE OPTIONS THAT YOU MIGHT PURSUE IN
14 ORDER TO ACHIEVE THE TARGET. THE IMPORTANT PART IS
15 ACHIEVING THE TARGET, SO WE'VE ADDED THAT FLEXIBILITY.
16 SO THAT AS WE PROCEED IN MONITORING LOCAL GOVERNMENTS AND
17 THE PRIVATE SECTOR COMING TO US WITH NEW IDEAS AND NEW
18 PROGRAMS, WE WILL BE ABLE TO SAY YES TO THAT INNOVATION
19 AND ADVANCEMENT IN DEMAND MANAGEMENT. BUT THAT IS A
20 SUBSTANTIAL ISSUE, AND ONE THAT WE NEED TO MONITOR VERY
21 CAREFULLY.

22 THE LAST ISSUE THAT I'LL MENTION IS THAT
23 THERE WAS SOME SUGGESTION THAT WE HAVE A CONTINGENCY PLAN
24 WITHIN THE MOBILITY PLAN IN CASE ONE OR MORE OF THESE
25 STRATEGIES DID NOT WORK. WE HAVE A CONTINGENCY PLAN,



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1 DEVELOPMENT EFFORT IN THE OVERALL WORK PROGRAM. WE HAVE
2 NOT INCLUDED A CONTINGENCY PLAN IN THIS DOCUMENT, BUT
3 WE'VE SPECIFIED THAT WE DO NEED TO MONITOR AND BE READY
4 AND BE RESPONSIVE TO CHANGING CONDITIONS, SO IF SOMETHING
5 IS NOT WORKING, WE NEED TO COME BACK AND LOOK AND SEE
6 WHAT ELSE WE NEED TO PUT INTO THE PLAN TO AUGMENT OR TO
7 CHANGE THE GOALS THAT WE'RE TRYING TO SHOOT FOR.

8 THE TRANSPORTATION COMMITTEE, I BELIEVE,
9 HAS THOROUGHLY DISCUSSED THESE ISSUES AND OTHERS RELATIVE
10 TO THE PLAN AND THE DRAFT ENVIRONMENTAL IMPACT REPORT
11 OVER THE LAST SEVERAL MONTHS.

12 MAYOR WRIGHT IS HERE, AND I BELIEVE SHE'LL
13 BE SHARING HER PERSPECTIVE WITH YOU LATER ON COMMITTEE
14 DISCUSSION DIALOGUE.

15 THE TRANSPORTATION COMMITTEE HAS
16 RECOMMENDED ADOPTION OF THE PLAN AND CERIFICATION OF THE
17 EIR THAT IS IN FRONT OF YOU. THE COMMUNITY -- ECONOMIC
18 AND HOUSING COMMITTEE HAS ALSO REVIEWED THE PLAN AND ALSO
19 RECOMMENDS ADOPTION OF THE PLAN.

20 THE ENERGY AND ENVIRONMENT COMMITTEE
21 REVIEWED THE PLAN LAST THURSDAY, AND THEY RAISED A NEW
22 ISSUE THAT I WOULD LIKE TO SPEND A MOMENT ON. AND I HAVE
23 A HANDOUT FOR YOU.

24 WHAT I'M HANDING OUT IS THE ACTION OF THE
25 ENERGY AND ENVIRONMENT COMMITTEE THAT THEY TOOK LAST

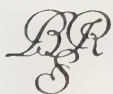
1 THURSDAY RELATIVE TO THE MOBILITY PLAN. I WAS NOT
2 PRESENT, BUT THE WAY -- AS I UNDERSTAND THE ACTION, WHEN
3 THEY WERE REVIEWING THE PLAN, THEY WERE ENTERTAINING A
4 MOTION TO CERTIFY THE EIR AND ADOPT THE PLAN WHEN AN
5 ISSUE WAS RAISED ABOUT THE SAN JOAQUIN HILLS CORRIDOR IN
6 SOUTHERN ORANGE COUNTY. THIS PARTICULAR CORRIDOR MAY BE
7 ONE THAT YOU'RE FAMILIAR WITH. WE'VE TALKED ABOUT IT IN
8 THE PAST FOR ORANGE COUNTY. IT'S DEVELOPED A TOLL-ROAD
9 PROGRAM FOR THAT PARTICULAR CORRIDOR.

10 SPECIAL LEGISLATION ON THE STATE AND
11 FEDERAL LEVEL HAS BEEN PASSED TO ALLOW TOLLS TO BE
12 CO-JOINED WITH FEDERAL AND STATE FUNDS TO HELP BUILD THIS
13 PARTICULAR CORRIDOR THAT WOULD INCLUDE MIXED FLOW LANES
14 AND HIGH OCCUPANCY VEHICLE LANES.

15 AS I UNDERSTAND IT, THE EEC THEN SAID THAT
16 THEY WOULD LIKE TO DELETE THAT PARTICULAR CORRIDOR FROM
17 THE PLAN. THEY WOULD LIKE, IF NECESSARY, A 30-DAY
18 EXTENSION TIME FOR THE STAFF TO ANALYZE THE IMPACTS OF
19 DELETING THAT PLAN OR THAT PROJECT AND ASKED FOR A REPORT
20 BACK. BUT THEY ALSO PASSED THE MAIN MOTION, WHICH WAS TO
21 APPROVE THE PLAN. I'LL BE PREPARED TO RESPOND TO THAT AT
22 THE APPROPRIATE TIME.

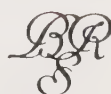
23 CHAIRMAN GRIFFIN: ALL RIGHT. THAT CONCLUDES
24 YOUR PRESENTATION?

25 MR. GOSNELL: YES, SIR.



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CHAIRMAN GRIFFIN: ANY QUESTIONS OF JIM?

ALL RIGHT. SEEING NONE, THEN I THINK THAT WHAT I WOULD ASK WE DO IS TO CONTINUE NOW WITH THE PUBLIC HEARING. AND THEN UPON CONCLUSION OF THAT, I WOULD LIKE TO CALL UPON JUDY WRIGHT OF THE TRANSPORTATION COMMITTEE TO GIVE A REPORT, AT THAT TIME, ON THEIR COMMITTEE RECOMMENDATIONS AND ACTIONS.

SO WITH THAT, I'LL NOW OPEN THE PUBLIC HEARING. AND THE FIRST CARD THAT I HAVE IS FROM JERRY BENNETT, AND THIS WOULD BE WITH REGARD TO THE TRANSPORTATION CORRIDOR AGENCIES. JERRY, IF YOU WILL, IDENTIFY YOURSELF AND PROCEED.

MR. BENNETT: THANK YOU PRESIDENT GRIFFIN, MEMBERS OF THE COMMITTEE. MY NAME IS JERRY BENNETT. I'M CHIEF ENGINEER OF THE TRANSPORTATION CORRIDOR AGENCIES OF ORANGE COUNTY, WHICH IS TWO SEPARATE AGENCIES. ONE OF WHICH IS DESIGNING, PLANNING, AND CONSTRUCTING THE SAN JOAQUIN HILLS TRANSPORTATION CORRIDOR. THE SAN JOAQUIN AGENCY INCLUDES THE CITIES OF SANTA ANA, COSTA MESA, NEWPORT BEACH, IRVINE, MISSION VIEJO, SAN JUAN CAPISTRANO, SAN CLEMENTE, AS WELL AS THE COUNTY OF ORANGE.

WHAT I WANT TO SPEAK TO YOU THIS MORNING ABOUT IS SPECIFICALLY TO THE ITEM THAT JIM MENTIONED AT THE CONCLUSION OF HIS REPORT; THE SUGGESTION THAT THE SAN

JOAQUIN HILLS CORRIDOR BE DELETED FROM THE REGIONAL MANAGEMENT PLAN.

I'D LIKE TO BEGIN BY TELLING YOU A LITTLE BIT ABOUT THE SAN JOAQUIN HILLS CORRIDOR. I'M REMINDING YOU SINCE I KNOW YOUR GROUP HAS DISCUSSED THIS MANY TIMES. THE PLANNING HAS BEEN UNDERWAY SINCE THE MID-'70S, AND THERE HAS BEEN CONTINUOUS PUBLIC DISCUSSION SINCE THAT TIME. AS YOU CAN SEE FROM THE MEMBERSHIP IN OUR AGENCY, WHICH IS CHARGED WITH ACTUALLY BUILDING IT, ALL BUT ONE OF THE CITIES IN THE AREA, THE LOCAL CITIES, ARE MEMBERS OF THE IMPLEMENTING AGENCY; THEREFORE, ARE SUPPORTING IMPLEMENTATION.

WE'VE DEVELOPED LOCAL FUNDING. AS JIM INDICATED, WE HAVE A TOLL LEGISLATION WHICH ENABLES US TO IMPLEMENT TOLL REVENUE BONDS. WE'RE IN THE PROCESS OF DEVELOPING OUR FINANCIAL PLAN CURRENTLY AS FUNDING SOURCES ARE SUCH THAT ABOUT 90 PERCENT OF THE FUNDING IS OTHER THAN FEDERAL AND STATE MONEY. SO WE'RE TRYING TO BUILD THIS THING AS A COALITION OF LOCAL AGENCIES WITH SUBSTANTIALLY LOCAL MONEY, YET CONSISTENT WITH THE REGIONAL PROCESS. WE HAVE WORKED WITH THAT REGIONAL PROCESS FOR MANY YEARS. IN FACT, PERSONALLY I WAS -- FOR MANY YEARS I WAS CHAIRMAN OF ONE OF YOUR ADVISORY COMMITTEES, THE MODEL TASK FORCE, SO I WAS PART OF SOME OF THOSE DISCUSSIONS.



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I HAPPEN TO KNOW THAT AS EARLY AS 1979 THE SAN JOAQUIN CORRIDOR BECAME A PART OF THE, WHAT WAS THEN CALLED, THE REGIONAL TRANSPORTATION PLAN. IT HAS BEEN CONTINUOUSLY OVER THOSE YEARS. WE'VE BEEN PROCEEDING IN THE MEANTIME WITH OUR ENVIRONMENTAL PROCESS AND OUR STATE IMPLEMENTATION PROCESS. FOR EXAMPLE, THIS ROUTE WAS DESIGNATED AS A PORTION OF ROUTE 73 STATE HIGHWAY ABOUT SIX OR SEVEN YEARS AGO, SO IT'S CONSISTENTLY BEEN A PART OF THE REGIONAL PLAN AND AS A STATE HIGHWAY. AND ANY DELETION OR ANY DISCUSSION OF DELETING IT, AT THIS POINT, WE BELIEVE IS INAPPROPRIATE.

THERE WAS SOME DISCUSSION ABOUT IDENTIFYING ENVIRONMENTAL IMPACTS ON SUCH A DELETION IN JIM'S REPORT. PERHAPS THE ENVIRONMENTAL COMMITTEE IS UNAWARE OF IT, BUT OUR ENVIRONMENTAL PROCESS LOCALLY HAS BEEN GOING ON FOR SEVERAL YEARS. WE HAD JUST THIS PAST YEAR AN EIR THAT WAS CIRCULATED, COMMENTED ON BY SCAG, AS WELL AS ALL THE OTHER RELEVANT AGENCIES. IT WAS ACKNOWLEDGED, AT THAT TIME, AS BEING CONSISTENT WITH ALL REGIONAL PLANS, AND IT CONTINUES TO BE THAT.

AND AMONG THE OTHER INTERESTING THINGS THAT ARE IN THAT EIR, THAT PERHAPS WOULD BE VALUABLE FOR THE ENVIRONMENTAL COMMITTEE TO KNOW, IS THAT THERE IS AN OVERALL FOUR PERCENT REDUCTION IN SOUTH ORANGE COUNTY EMISSIONS OF REACTIVE ORGANIC GASES AND CARBON MONOXIDE.



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SO DISCUSSION ABOUT ENVIRONMENTAL IMPACTS, I BELIEVE, SHOULD BE A DISCUSSION OF THE POSITIVE IMPACTS OF BUILDING THE PROJECT AND NEGATIVE IMPACTS OF ANY POTENTIAL DELETION OF IT.

SIMILARLY, JUST TO POINT OUT ONE OF THE OTHER BENEFITS OF THE PROJECT ON TRAFFIC FLOW, THE TRAFFIC ON PACIFIC COAST HIGHWAY, PARALLEL TO IT THROUGH -- FOR EXAMPLE, THE CITY OF LAGUNA BEACH GOES DOWN -- BY THE FUTURE YEAR 2010, TRAFFIC WOULD GO DOWN ON THE ORDER OF WITHIN 20 TO 30 PERCENT AS A RESULT OF THE TRANSPORTATION CORRIDOR HAVING BEEN CONSTRUCTED.

SO WE WOULD MAINTAIN THERE'S A CONSISTENT RECORD OF CORRECT ENVIRONMENTAL PROCEDURES. IT'S BEEN IN THE PLANS. WE THINK IT SHOULD STAY IN THE PLAN. YOUR REGIONAL MOBILITY PLAN IS CONSISTENT WITH OUR MASTER PLAN OF ARTERIAL HIGHWAYS IN THE COUNTY. IT'S CONSISTENT WITH ALL THE GENERAL PLANS IN THE COUNTY. SO ALL OUR GROWTH PROJECTIONS WORK TOGETHER, AND THIS IS A NECESSARY ELEMENT OF ALL OF THAT.

YOUR TRANSPORTATION COMMITTEE HAS RECOMMENDED ADOPTION OF IT. I HAVE TO BELIEVE THAT INASMUCH AS IT HAS BEEN A THREE-YEAR PROCESS, AS JIM DESCRIBED, AND ONE WEEK PRIOR TO THE CONCLUSION, PRIOR TO TODAY, TO HAVE A COMMITTEE COME UP WITH A RECOMMENDATION LIKE THIS, AND IT DOES NOT GET DISCUSSED WITH THE



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TRANSPORTATION COMMITTEE. I THINK IT SORT OF SPEAKS FOR ITSELF. IT'S A LAST MINUTE IDEA, IN MY VIEW, AND I'LL ADVISED.

WITH THAT, WE RECOMMEND THAT YOU CERTIFY YOUR ENVIRONMENTAL IMPACT REPORT AND REGIONAL MOBILITY PLAN. AND I'D BE HAPPY TO ANSWER ANY QUESTIONS.

CHAIRMAN GRIFFIN: ANY QUESTIONS OF JERRY BENNETT?

THANK YOU VERY MUCH. APPRECIATE YOUR TESTIMONY.

MR. BENNETT: THANK YOU.

CHAIRMAN GRIFFIN: I'D LIKE TO CALL UPON BILLY GYAK FROM THE COUNTY OF ORANGE. GOOD MORNING, BILL.

MR. GYAK: GOOD MORNING, DON. THANK YOU PRESIDENT GRIFFIN, AND EXECUTIVE COMMITTEE MEMBERS.

I'M ACTUALLY HERE TO ADDRESS THREE ITEMS. AND I DON'T KNOW QUITE HOW WE'LL DO IT, BUT WE'LL WORK OUR WAY THROUGH IT.

ALONG WITH JERRY, I DO -- THE COUNTY OF ORANGE IS ALSO CONCERNED ABOUT THE RECOMMENDATION FROM EEC COMMITTEE. AND WE WOULD STRONGLY -- AGAIN, STRONGLY URGE THAT THE EXECUTIVE COMMITTEE CERTIFY THE RMP EIR, AS WELL AS APPROVE THE REGIONAL MOBILITY PLAN FOR THE SAME REASONS THAT JERRY HAS INDICATED.

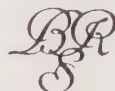
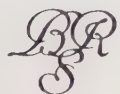
IN ADDITION, WE WANTED TO OFFER SOME

COMMENTS ON THE GROWTH MANAGEMENT PLAN. OUR COUNTY HAS SUPPORTED THE USE OF THE STATE DEPARTMENT FINANCE NUMBERS, WHICH ARNIE HAS SPOKEN TO, BUT WE'D ALSO URGE THAT SCAG INCORPORATE THE ORANGE COUNTY PROJECTIONS OF 1988. THOSE WERE APPROVED BY OUR BOARD OF SUPERVISORS AND FORMERLY TRANSMITTED TO SCAG AS THE COUNTY'S OFFICIAL PROJECTION ON THIS MATTER.

I'D JUST LIKE TO MENTION, TOO, THAT THEY HAVE BEEN REVIEWED BY EACH OF THE ORANGE COUNTY CITIES, AND EXCEPT FOR A COUPLE OF INSTANCES, THERE'S A GENERAL CONSENSUS IN THE COUNTY THAT THOSE WILL BEST REFLECT THE GROWTH.

THE THIRD ITEM ACTUALLY APPLIES TO THE NEXT ITEM ON THE AGENDA WHICH IS THE BLUE RIBBON REPORT. AND I HAVE A LETTER PREPARED BY SUPERVISOR WIEDER THAT WE WOULD LIKE TO HAVE READ INTO THE RECORD. AND I CAN DO IT NOW OR --

CHAIRMAN GRIFFIN: LET'S DO THAT AND ACKNOWLEDGE THAT INTO THE RECORD NOW. AND I'VE JUST ASKED FOR YOUR INFORMATION, BILL, AND THE EXECUTIVE COMMITTEE NOW HAS A COPY OF THOSE BEFORE THEM. IT'S JUST BEEN PASSED OUT, SO THE RECORD WILL SHOW RECEIPT OF THE LETTER FROM SUPERVISOR HARRIET WIEDER, SECOND DISTRICT, ADDRESSED TO THE MEMBERS OF SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS. THE SUBJECT: FEBRUARY 2 EXECUTIVE



1 COMMITTEE MEETING, AGENDA ITEM 6-A AND B. THAT WILL BE
2 RECEIVED AND FILED IN THE RECORD.

3 MR. GYAK: I'LL GO THROUGH IT. I'LL READ IT.

4 UNFORTUNATELY -- THIS IS FROM SUPERVISOR
5 WIEDER -- UNFORTUNATELY, I AM UNABLE TO ATTEND THURSDAY'S
6 EXECUTIVE COMMITTEE MEETING DUE TO PRIOR COMMITMENTS. I
7 AM --

8 CHAIRMAN GRIFFIN: IT ISN'T NECESSARY THAT
9 YOU --

0 MR. GYAK: OKAY.

1 CHAIRMAN GRIFFIN: -- READ IT ALL.

2 MR. GYAK: WELL, THEN LET ME KIND OF JUST GO
3 OVER THE POINTS.

4 NUMBER ONE IS SUPERVISOR WIEDER OBVIOUSLY
5 WANTS TO APOLOGIZE. SHE HAS A SPEAKING ENGAGEMENT AT THE
6 ORANGE COUNTY CHAMBER OF COMMERCE.

7 WE WOULD PROBABLY ALSO NEED TO MAKE A
8 CORRECTION ON THE SECOND PAGE. IT'S OUR UNDERSTANDING
9 THAT THE -- THAT THE TRANSCRIPTS, AS THEY WERE SENT TO
0 ORANGE COUNTY, WERE NOT ACCURATE. THAT THE MOTION DID
1 NOT COME FROM AN ELECTED OFFICIAL OUTSIDE OF ORANGE
2 COUNTY, BUT IT WAS AN ELECTED OFFICIAL INSIDE OF ORANGE
3 COUNTY. WE WILL NOTE THAT.

4 BUT -- BUT AGAIN OUR -- TO CONTINUE, WE
5 WOULD STILL WANT TO REEMPHASIZE THAT OUR CONCERN IS THAT

1 WE -- IS THAT THESE KINDS OF SITUATIONS, I THINK, OCCUR.
2 IT'S OUR FEELING THAT THEY COULD BE PREVENTED IF WE HAD
3 MORE OF A DECENTRALIZED APPROACH TO REGIONAL PLANNING.
4 THAT'S REALLY THE GIST OF THE LETTER.

5 AND WITH THAT, I'LL SAY NO MORE.

6 CHAIRMAN GRIFFIN: THANK YOU. ANY QUESTIONS OF
7 MR. GYAK?

8 YES, GLORIA MOLINA.

9 MS. MOLINA: YOU'RE REPRESENTING HARRIET WIEDER
10 ON THIS LETTER?

11 MR. GYAK: YES.

12 MS. MOLINA: I DON'T -- I'M TRYING TO UNDERSTAND
13 THE LETTER.

14 MR. GYAK: OKAY.

15 MS. MOLINA: MAYBE YOU CAN EXPLAIN IT. WHAT
16 SHE'S SAYING IS ORANGE COUNTY BELIEVES THAT THE REGIONAL
17 PLANNING PROCESS SHOULD BE DECENTRALIZED?

18 MR. GYAK: YES.

19 MS. MOLINA: THAT DOES NOT MAKE SENSE TO ME.
20 COULD YOU EXPLAIN THAT TO ME?

21 MR. GYAK: WELL, I THINK ON THE -- ON THE SECOND
22 PAGE, I BELIEVE, IN THE LAST PARAGRAPH PROBABLY EXPLAINS
23 IT. WHAT WE ARE SAYING -- OUR IDEA IS THAT IF YOU HAD AN
24 INTERACTIVE-TYPE PLANNING APPROACH, SUCH AS WE HAVE HAD
25 ON THIS -- FOR EXAMPLE, THE SAN JOAQUIN HILLS CORRIDOR.



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1 IN THAT -- AND THAT WAS DONE REALLY AT THAT SUBREGIONAL
2 LEVEL, AND THEN THAT WOULD BE INTEGRATED INTO A REGIONAL
3 PLANNING PROCESS THAT WOULD -- THAT WOULD, YOU KNOW, BE
4 MORE OF A MULTI-COUNTY PROCESS SUCH AS, YOU KNOW, NOW --
5 SUCH AS WITH SCAG.

6 MS. MOLINA: THE LANGUAGE THAT YOU POINTED TO
7 WITH REGARD TO SCAG'S ENERGY AND ENVIRONMENT COMMITTEE,
8 IS THE CRITICISM THERE OF THE ACTION OR THE PROCESS?

9 MR. GYAK: WELL, BOTH. BOTH.

0 MS. MOLINA: THEN WERE THEY THERE?

1 MR. GYAK: PARDON?

2 MS. MOLINA: I MEAN, THE PROCESS PERMITS THEM TO
3 BE THERE TO PROVIDE INPUT, RIGHT?

4 MR. GYAK: CORRECT.

5 MS. MOLINA: SO THEN, I MEAN -- I UNDERSTAND
6 CRITICISM OF THE ACTION, THAT'S ALWAYS FAIR. WHAT I'M
7 CONCERNED ABOUT IS THE CRITICISM OF THE PROCESS BECAUSE
8 ORANGE COUNTY WAS EXCLUDED FROM THAT KIND OF
9 PARTICIPATION -- DISCUSSION.

0 MR. GYAK: NO. BECAUSE WHAT WE FEEL IS THAT THE
1 PLANS DEVELOPED AT A -- AT A SUBREGIONAL LEVEL SUCH AS --
2 SUCH AS THE SAN JOAQUIN HILLS CORRIDOR ARE BEST DEALT
3 WITH AND PLANNED FOR AND DECISIONS MADE AT THAT LEVEL,
4 AND THEN -- AND THEN IT WOULD BE MOST EFFECTIVE IF THEY
5 WERE THEN INTEGRATED INTO A MUCH LARGER SCHEME SUCH AS

1 THE TRANSPORTATION PLAN FOR THE ENTIRE REGION.

2 MS. MOLINA: BUT THIS WAS AT A COMMITTEE LEVEL
3 SO -- I'M NOT UNDERSTANDING YOU. I THINK THE BIGGEST
4 CHALLENGE WE ALL HAD BEFORE WAS UNDERSTANDING REGIONAL
5 PLANNING, AND SO IT HAS TO BE CENTRALIZED, BUT IT HAS TO
6 HAVE COMPONENTS THAT ALL WORK IN SYNC. AND THAT'S WHAT I
7 AM CONCERNED ABOUT.

8 WAS ORANGE COUNTY NOT PRESENT AT THIS
9 COMMITTEE TO SHARE ITS CONCERNS ABOUT THE CORRIDOR?

10 MR. GYAK: THE COUNTY WAS NOT AT THIS MEETING.

11 MS. MOLINA: IS IT BY ACTION OF THE PROCESS OR
12 JUST BY CHOICE?

13 MR. GYAK: I ASSUME IT'S CHOICE.

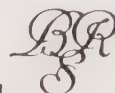
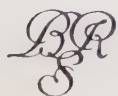
14 MS. MOLINA: THAT'S AN IMPORTANT POINT. IT'S
15 HARD TO UNDERSTAND THIS CONCEPT OR THIS LETTER, BUT IT'S
16 CLEAR TO ME NOW.

17 MR. GYAK: OKAY.

18 CHAIRMAN GRIFFIN: WE HAVE TIM JOHNSON.

19 MR. JOHNSON: MAYBE YOU CAN -- AND I DON'T WANT
20 TO BELABOR THIS, BUT SINCE THIS IS MY LAST MEETING, I
21 THINK I CAN GET AWAY WITH SAYING THIS.

22 I FIND IT BREATHTAKINGLY MISGUIDED TO
23 ASSERT THAT A SUBREGIONAL DISPUTE THAT HAS BEEN GOING ON
24 FOR YEARS IS SOMEHOW THE FAULT OF THE REGIONAL PLANNING
25 AGENCY. COULD YOU CORRECT ME SOMEHOW?



1 MR. GYAK: I DON'T UNDERSTAND YOUR QUESTION.

2 MR. JOHNSON: YOU HAVE A DISPUTE AMONG CITIES IN
3 ORANGE COUNTY, AND SOMEHOW IT'S THE FAULT OF THE REGIONAL
4 PLANNING ASSOCIATION?

5 MR. GYAK: WELL, I THINK THE CONCERN IS THAT IT
6 GOT SURFACED IN THE REGIONAL PLANNING AGENCY. IN FACT,
7 AS JERRY INDICATED, THERE ARE, I BELIEVE, EIGHT ENTITIES
8 INVOLVED WITHIN THAT PARTICULAR PLANNING STRUCTURE. AND
9 SO I'M NOT QUITE SURE THAT -- THAT IT'S -- IN OTHER
10 WORDS, THAT THERE IS -- THERE IS ONE ENTITY THAT DOES
11 HAVE SOME CONCERNS, YOU KNOW, WITH THAT PARTICULAR PLAN,
12 AND AT THE SAME TIME THERE ARE EIGHT THAT DO NOT. THE
13 EIGHT ENTITIES THAT COOPERATE -- THAT COOPERATION DID NOT
14 SURFACE AS DID THIS -- AS DID THE ONE CRITICISM.

15 CHAIRMAN GRIFFIN: ALL RIGHT. FURTHER
16 QUESTIONS?

17 OKAY. WE NOW HAVE SKIP WRIGHTSON FROM THE
18 VALLEY INDUSTRY AND COMMERCE ASSOCIATION.

19 MR. WRIGHTSON: GOOD MORNING LADIES AND
20 GENTLEMEN. MY NAME IS SKIP WRIGHTSON. I'M
21 VICE-PRESIDENT OF THE VALLEY INDUSTRY AND COMMERCE
22 ASSOCIATION AND CHAIRMAN OF THE TRANSPORTATION COMMITTEE.
23 VICA IS A -- THAT'S VALLEY INDUSTRY AND COMMERCE
24 ASSOCIATION -- IS A 40-YEAR-OLD NONPROFIT BUSINESS
25 ASSOCIATION BASED IN THE SAN FERNANDO VALLEY. WE

1 REPRESENT SEVERAL LARGE AND MEDIUM SIZE COMPANIES IN THE
2 VALLEY, SUCH AS LITTON, ROCKETDYNE, ANHEUSER-BUSCH, AUTO
3 CLUB. WE WERE FOUNDED TO DEVELOP PARTS OF THE VALLEY AND
4 ENCOURAGE INDUSTRY INTO IT. AND WE HAVE BEEN WORKING
5 WITH THE RESIDENTS, HOME OWNERS, COMMERCIAL INTERESTS,
6 AND INDUSTRY TO BRING BALANCE IN THE VALLEY.

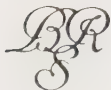
7 WE HAVE REVIEWED THE AQMP, THE REGIONAL
8 MOBILITY PLAN AND THE GROWTH MANAGEMENT PLAN AS PROPOSED
9 FOR ADOPTION IN MARCH. WE HAVE CONSIDERABLE CONCERNS
10 REGARDING THE LIKELIHOOD OF THESE PLANS WORKING IN
11 CONCERT WITH EACH OTHER BECAUSE OF SEVERAL REALITIES
12 WHICH, WE BELIEVE, NEED TO BE ADDRESSED.

13 OUR SPECIFIC CONCERNS ARE THREE -- AND I'LL
14 JUST SUMMARIZE -- THEY ARE: THE NEED FOR JOB/HOUSING
15 BALANCE TO BE ACHIEVED IN AN SYNERGETIC MANNER.

16 DEVELOPMENT OF SOURCES OF REVENUE TO MEET
17 THIS MULTI-BILLION DOLLAR SHORTFALL.

18 AND THIRD, PRIORITIES SEEM TO BE BIASED IN
19 FAVOR OF THE VERY COSTLY RAPID TRANSIT INFRASTRUCTURE
20 PROJECTS RATHER THAN DIRECTED TOWARD PROJECTS OF MUCH
21 LESS COST WHICH CAN PRODUCE IMMEDIATE BENEFITS.

22 REVIEWING THE TRANSPORTATION DEMAND
23 MANAGEMENT PLAN AND GOALS, VICA QUESTIONS THE FEASIBILITY
24 OF ELIMINATING 3 MILLION DAILY WORK TRIPS THROUGH WORK AT
25 HOME AND TELECOMMUTING AS BEING UNREALISTICLY HIGH.



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1 SECONDLY, BELIEVES THAT THE INCREASES IN
2 RIDE SHARING TO 1.6 MILLION DAILY WORK TRIPS WILL NOT
3 OCCUR UNLESS INCENTIVES ARE ESTABLISHED SUCH AS HIGH
4 OCCUPANCY VEHICLE LANES AND RAMPS OR PARKING CHANGES.

5 AND THIRD, INCREASED TRANSIT USAGE TO 1.4
6 MILLION DAILY WORK TRIPS SEEMS UNREALISTIC IN THE NEAR
7 TERM DUE TO THE LACK OF INFRASTRUCTURE AND LONG TERM
8 CONSTRUCTION NECESSARY TO PROVIDE THE INFRASTRUCTURE.

9 HOWEVER, VICA IS PREPARED TO SUPPORT THESE
10 PLANS AND THEIR GOALS AS WELL AS THE MEANS FOR ACHIEVING
11 THEM, BUT IT'S IMPERATIVE THAT ELECTED GOVERNMENT
12 OFFICIALS ARE WILLING TO BITE-THE-BULLET AND MAKE THE
13 NECESSARY LEGISLATIVE CHANGES REQUIRED TO ACCOMPLISH
14 THESE GOALS AND FUNDING.

15 FOR EXAMPLE, VICA SPECIFICALLY SUPPORTS THE
16 CREATION OF -- AND I'LL SUMMARIZE AGAIN -- FOUR EXAMPLES:

17 HIGH OCCUPANCY VEHICLE LANES ON ALL MAJOR
18 FREEWAY ROUTES.

19 HIGH OCCUPANCY BYPASS ENTRANCE RAMPS AT ALL
20 FREEWAY ENTRANCES.

21 LEGISLATIVE REFORMS TO ENABLE JOB/HOUSING
22 BALANCE, WHICH HAS BEEN MENTIONED HERE. BUT LET ME
23 STRESS: WE'RE TALKING AFFORDABLE HOUSING FOR THE TYPE OF
24 JOBS THAT ARE GENERATED. FOR EXAMPLE, IF AN OFFICE
25 BUILDING IS CREATED, LET'S HAVE COMPLEMENTARY HOUSING FOR

1 THOSE OFFICE WORKERS NOT AT COST LEVELS THAT THEY CANNOT
2 AFFORD.

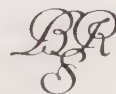
3 THIRD, DEVELOPING FUNDING SOURCES FOR THE
4 IMPLEMENTATION OF THE PLANS. THIS MUST BE A PROACTIVE
5 ACTIVITY BY THE LEGISLATORS AND OTHER GOVERNMENT
6 OFFICIALS IF IT IS TO SUCCEED. SOME SPECIFIC EXAMPLES
7 WOULD BE A REGIONAL GAS TAX, DEVELOPMENT TAXES ON NEW
8 DEVELOPMENTS TO PROVIDE APPROPRIATE REVENUE TO BUILD
9 INFRASTRUCTURE AND FREEWAY ACCESS CHARGES.

10 FINALLY, SYSTEM MANAGEMENT AND DEMAND
11 MANAGEMENT ACTIVITIES DESIGNED TO ENCOURAGE SHIFTING
12 HOURS OF EMPLOYMENT OFF OF PRESENT PEAK PERIODS TO
13 EARLIER START TIMES OR LATER START TIMES.

14 IN SUMMARY, VICA STANDS READY TO GET -- TO
15 ACT AS A PARTICIPANT IN PROVIDING MEANINGFUL NEGOTIATIONS
16 WITH LARGE SAN FERNANDO VALLEY TRAFFIC GENERATORS TO
17 IDENTIFY AND IMPLEMENT CONGESTION REDUCTION CHANGES IN
18 THEIR OPERATION.

19 VICA ALSO STANDS READY TO ASSIST IN PUBLIC
20 EDUCATION AND PROACTIVELY CREATING AN UNDERSTANDING FOR
21 THE NEED FOR ADDITIONAL REVENUES TO PAY FOR THE MOBILITY
22 PLAN AND FOR THE TOUGH ADHERENCE TO THIS SYNERGETIC
23 JOB/HOUSING BALANCE IN ALL FUTURE SCAG REGIONAL MEETINGS.
24 DEVELOPMENT.

25 THANK YOU, AGAIN. IF THERE ARE ANY



1 QUESTIONS?

2 CHAIRMAN GRIFFIN: ANY QUESTIONS OF SKIP?
3 PARDON ME FOR ROAMING AROUND. I WAS LISTENING.

4 MR. WRIGHTSON: WE HAVE A COPY OF OUR STATEMENT
5 PROVIDED FOR THE STENOGRAPHER, IF THAT'S APPROPRIATE.

6 CHAIRMAN GRIFFIN: IT'S CERTAINLY OKAY.

7 IS THERE ANY OTHER TESTIMONY TO BE GIVEN?
8 IN A MOMENT -- I'LL KEEP THE PUBLIC HEARING OPEN.

9 ALL RIGHT. AT THIS TIME I'D LIKE TO ASK FOR
10 DAVE GRAYSON TO GIVE US AN ADVISORY COUNCIL REPORT.
11 WELCOME, DAVE.

12 MR. GRAYSON: THANK YOU, ALL OF YOU, FOR THIS
13 OPPORTUNITY TO SHARE WITH YOU SOME FURTHER THOUGHTS FROM
14 THE REGIONAL ADVISORY COUNCIL.

15 YOU MAY RECALL THAT JUDITH WESTIN JOHNSON
16 CAME BEFORE THIS COMMITTEE IN JULY LAST YEAR AS THE PLAN
17 WAS IN ITS DEVELOPMENTAL STAGES. AND WE BROUGHT A NUMBER
18 OF RECOMMENDATIONS FROM THE COUNCIL TO YOU, OUR THOUGHTS
19 ABOUT HOW THE PLAN MIGHT BE SHAPED AND SOME SPECIFIC
20 THOUGHTS FOR INCLUSION.

21 AND I WANT TO, FIRST OF ALL, EXPRESS THE
22 COUNCIL'S APPRECIATION FOR THE MANNER IN WHICH THAT PLAN
23 HAS ADDRESSED THE CONCERNS THAT WERE IDENTIFIED BY THE
24 MEMBERS OF THE REGIONAL ADVISORY COUNCIL, ESPECIALLY THE
25 INCORPORATION OF THE FINDINGS CONTAINED IN THE OLYMPIC

1 LEGACY POLICY RECOMMENDATIONS DOCUMENT, WHICH WAS
2 DEVELOPED A COUPLE OF YEARS AGO BY THE REGIONAL ADVISORY
3 COUNCIL WITH THE SUPPORT OF THE SCAG STAFF.

4 HOWEVER, THERE ARE A COUPLE OF MINOR, BUT
5 WE BELIEVE IMPORTANT, ADDITIONAL REVISIONS WHICH WE WOULD
6 LIKE YOU TO CONSIDER TO THE PLAN AS IT STANDS.

7 NUMBER ONE -- AND I THINK NOW YOU ALL HAVE
8 A COPY OF THIS. IT IS IN WRITING, SO I'LL JUST
9 PARAPHRASE -- NUMBER ONE WITH REGARD TO SYSTEM
10 MANAGEMENT. THE TIME FRAME FOR IMPLEMENTING THE
11 REMAINING RAMP METERS AND HIGH OCCUPANCY BYPASS LANES AT
12 THOSE RAMPS CURRENTLY IS NOT SCHEDULED FOR COMPLETION
13 UNTIL THE YEAR 2010. AND WE BELIEVE THAT THAT TIME FRAME
14 SHOULD BE SHORTENED AND COULD EASILY BE SHORTENED. I'M
15 ADVISED THIS MORNING BY JIM GOSNELL THAT SUCH A CHANGE IS
16 ALREADY IN THE PROCESS.

17 THE SECOND IS WITH REGARD TO JOB/HOUSING
18 BALANCE. WE BELIEVE THAT ONE OF THE ACTIONS MOST READILY
19 AVAILABLE TO PUBLIC OFFICIALS IS THE PRIORITIZATION OF
20 CAPITAL EXPENDITURES. WE ALL SET IN MEETINGS REGULARLY
21 WHERE DECISIONS ARE MADE ABOUT CAPITAL EXPENDITURES, AND
22 THAT REVIEWING THESE CAPITAL EXPENDITURES TO DETERMINE
23 THEIR IMPACT UPON JOB/HOUSING BALANCE IS NOT CURRENTLY
24 DONE AS A GENERAL RULE. WE ARE LEANING MORE AND MORE, AS
25 WE MOVE FORWARD, IN THE EVALUATION AND PRIORITIZATION OF



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1 CAPITAL IMPROVEMENTS BY PUBLIC AGENCIES IS HOW TO DO IT
2 BEST.

3 POSSIBLY, AN EXAMPLE OF THE WAY IN WHICH WE
4 ARE REVIEWING IT IS THAT WE REQUIRE ENVIRONMENTAL IMPACT
5 STATEMENTS. BUT MOST RECENTLY WE'VE TAKE ON, AND ARE
6 BEGINNING TO ADD ONTO THAT ENVIRONMENTAL REVIEW PROCESS,
7 A LOOK AT THE SOCIOECONOMIC IMPACTS. OUR THOUGHT HERE IS
8 THAT THOSE PROJECTS ALSO OUGHT TO BE EVALUATED ON THEIR
9 IMPACT UPON JOB/HOUSING BALANCE. THAT IS NOT TO SAY THAT
10 A PROJECT WOULDN'T MOVE FORWARD ON THAT DECISION, BUT
11 THAT THE AGENCIES MAKING THE DECISION WOULD LOOK AT THOSE
12 PROJECTS WITH AN UNDERSTANDING OF HOW THEY WILL IMPACT
13 JOB/HOUSING BALANCE.

14 WE BELIEVE SUCH AN EVALUATION PROCESS WILL
15 ALSO BRING INTO SHARPER FOCUS THE THINKING OF THE PROJECT
16 PROPONENTS ON THIS ISSUE. AND WE WILL CHALLENGE THEM TO
17 POSSIBLY INCORPORATE IN THEIR PROJECT ELEMENTS, WHICH
18 OTHERWISE MIGHT NOT BE INCLUDED, THAT MIGHT HELP US MOVE
19 TOWARDS OUR GOAL OF JOB/HOUSING BALANCE AND SPECIFICALLY
20 REDUCTIONS OF THE COMMUTE TRAVEL.

21 SO THOSE ARE THE TWO THOUGHTS THAT WE HAVE.
22 AT THIS POINT, I'D BE GLAD TO RESPOND TO ANY QUESTIONS.

23 CHAIRMAN GRIFFIN: ANY QUESTIONS OF DAVE
24 GRAYSON?

25 THANK YOU, DAVE. PLEASE EXPRESS TO RAC OUR

1 APPRECIATION FOR THE FINE WORK THAT THEY'RE DOING. ALL
2 RIGHT. AT THIS TIME, THEN, I WILL OFFICIALLY CLOSE THE
3 PUBLIC HEARING.

4 AND I WOULD LIKE TO, AT THIS TIME, CALL FOR
5 THE CHAIRMAN OF THE TCC, AND THAT IS JUDY WRIGHT. JUDY,
6 WE'D LOVE TO HEAR FROM YOU.

7 MS. WRIGHT: THANK YOU. I WILL NOT REPEAT
8 EVERYTHING THAT JIM GOSNELL SAID. IN FACT, HE GAVE ME A
9 CHEAT SHEET THAT ALMOST DOES REPEAT THAT. I'LL TRY TO
10 SUMMARIZE THE FINDINGS OF THE TCC AND ALSO ADD SOME
11 INFORMATION THAT, I THINK, HAS COME UP THIS MORNING.

12 FIRST OF ALL, I THINK THAT ALL OF YOU ARE
13 AWARE THAT SOME OF THE COMMITTEES ARE RATHER SMALL. BUT
14 I THINK TCC, WHILE ITS NUMBERS MAY BE SMALL, IT'S
15 EXTREMELY REPRESENTATIVE OF THE REGION. WE HAVE HAD FIVE
16 COUNTIES REPRESENTED IN ALMOST EVERY MEETING DEALING WITH
17 THIS SUBJECT AND ALSO CALTRANS AND THE AIR RESOURCES
18 BOARD, RTD, AND THE AUTO CLUB. AND UNFORTUNATELY, TO
19 RESPOND TO COUNCILWOMAN MOLINA, ORANGE COUNTY HAS NOT
20 BEEN REPRESENTED MOST OF THE TIME, AND WE HAVE TWO
21 MEMBERS FROM LAGUNA BEACH WHO HAVE NEVER BEEN THERE. SO
22 SINCE I AM NOT REALLY A MEMBER OF THE EXECUTIVE COMMITTEE
23 I CAN SAY THAT.

24 I THINK IT'S UNFORTUNATE THAT THE SAN
25 JOAQUIN CORRIDOR ISSUE CAME UP AT THE LAST MOMENT BECAUSE

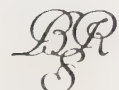


1 IT WASN'T EVER PRESENTED TO THE TCC BEFORE TODAY. BUT I
 2 THINK THERE'S A LARGER ISSUE. YOU KNOW, WE ALL COME FROM
 3 OUR PAROCHIAL CONCERNS TO A REGIONAL BODY AND TRY TO
 4 FORGET THOSE FOR A COUPLE OF HOURS AND LOOK AT THE
 5 REGION. THERE ARE ALL KINDS OF PROJECTS IN OUR SUBREGION
 6 THAT WE MAY BE IN DISAGREEMENT ABOUT, THE 210 FREEWAY AND
 7 THE ONTARIO AIRPORT, ET CETERA, AMONG COMMUNITIES WITHIN
 8 THE REGION.

9 BUT I THINK THAT WE SUPPORT THIS PLAN AND
 0 KNOW THAT EACH PROJECT, WHETHER IT IS THE 210 FREEWAY OR
 1 THE SAN JOAQUIN CORRIDOR, WILL BE LOOKED AT INDIVIDUALLY;
 2 AND, AT THAT TIME, INDICATING MEASURES WILL BE
 3 CONSIDERED. SO I DO NOT THINK WITHOUT THIS GOING BACK TO
 4 THE TCC, THAT THE TCC WOULD APPROVE OF THE ENVIRONMENTAL
 5 COMMITTEE'S ACTION LAST WEEK.

6 I THINK THAT WE HAVE LOOKED VERY CAREFULLY
 7 TO YOUR GUIDANCE; AND, IN FACT, CAME UP WITH THREE
 8 STRATEGIES FOR THE OVERALL REGIONAL MOBILITY PLAN, AND
 9 YOU CAME UP A FOURTH STRATEGY THAT WE HAVE WORKED WITH,
 0 AND IT INCLUDES FOUR ELEMENTS: AS JIM SAID, GROWTH
 1 MANAGEMENT, TRANSPORTATION, DEMAND MANAGEMENT, AND
 2 TRANSPORTATION SYSTEMS MANAGEMENT.

3 AND IN LOOKING AT THESE FOUR STRATEGIES, WE
 4 EXAMINED CAREFULLY HOW WE CAN -- WE KNOW WE HAVE A
 5 CHICKEN-EGG SITUATION. HOW DO YOU ENCOURAGE DEMAND



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1 MANAGEMENT? WHAT DO YOU BUILD FIRST, THE TRANSPORTATION
 2 FACILITY? OR DO YOU START WITH THE DEMAND MANAGEMENT?
 3 HOW DO YOU ENCOURAGE JOB/HOUSING BALANCE?

4 AND WE HAVE EXAMINED THIS -- IF YOU'VE READ
 5 OUR MINUTES PRETTY CAREFULLY -- AND I THINK THERE'S STILL
 6 A LOT OF QUESTIONS ON THAT TO BE EXAMINED BY A TASK FORCE
 7 THAT HAS BEEN SUGGESTED.

8 WE HAVE COME UP WITH THE STRATEGIES DIVIDED
 9 INTO TWO CATEGORIES:

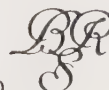
10 THE CONSTRAINED, WHICH DOES HAVE FUNDING.

11 AND THE UNCONSTRAINED, WHICH OBVIOUSLY DOES
 12 NOT HAVE FUNDING. AND THERE IS AN APPROPRIATE PROGRAM TO
 13 TRY TO ACHIEVE THE UNCONSTRAINED.

14 THE RAC RECOMMENDATIONS THAT WERE SUGGESTED
 15 TODAY, I THINK, IN CONTENT, THE TCC WOULD HAVE NO PROBLEM
 16 WITH THOSE.

17 I THINK THAT, AGAIN, THE JOB/HOUSING
 18 BALANCE STATEMENT IS JUST PART OF THAT CHICKEN-EGG
 19 SITUATION ABOUT WHAT TO DO FIRST TO ENCOURAGE THAT -- FOR
 20 THAT SOUNDS LIKE A GOOD WAY TO ENCOURAGE THAT.

21 AND JUST IN CLOSING, I WOULD LIKE TO SAY A
 22 COUPLE OF THINGS SINCE I KNOW YOU'RE FAMILIAR WITH THE
 23 PLAN, BUT MAYBE NOT THE THINKING OF HOW WE IMPLEMENT THAT
 24 PLAN. THAT -- I WANT TO SHARE WITH YOU SOMETHING FRANK
 25 HOTCHKISS IS WORKING ON IN OUR AREA, OUR SUBREGION, THAT



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1 I THINK THE PLANS HAVE REALLY CAUSED.

2 THERE ARE ELEVEN COMMUNITIES IN THE INLAND
3 EMPIRE IN AN ORGANIZATION CALLED "CLOUT" (PHONETIC) THAT
4 REALIZES IF THEY DON'T WORK WITHIN THESE PLANS -- THE
5 PLANS ARE GOING TO TELL THEM WHAT TO DO. AND THEY HAVE
6 ORGANIZED TO NOT ONLY LOOK AT THE JOB/HOUSING BALANCE
7 SITUATION IN THE INLAND EMPIRE, BUT ACTUALLY DO A STUDY
8 AT CHAFFEY JR. COLLEGE ON HOW TO RETRAIN WORKERS TO WORK
9 WITHIN THE REGION IN CLEAN INDUSTRY AND IN OTHER WAYS
10 BECAUSE THAT'S REALLY A PART OF THIS. AND I THINK THAT
11 PROBABLY SHOULD BE ADDED TO OUR PLANS THROUGH THE YEARS
12 AS TO HOW WE TRAIN PEOPLE TO WORK IN AN INDUSTRY WE CAN
13 ALL LIVE WITH.

14 AND SO I THINK TO CLOSE. THEN, THE TCC DOES
15 RECOMMEND THE PLAN. WE RECOMMEND THE TASK FORCE TO WORK
16 ON IMPLEMENTATION OF THE PLAN PARTICULARLY IN THE AREA OF
17 DEMAND MANAGEMENT AND JOB/HOUSING. THANK YOU.

18 CHAIRMAN GRIFFIN: JUDY, WE REALLY APPRECIATE
19 THE TREMENDOUS WORK YOU'RE DOING. AND I KNOW THAT THE
20 EXECUTIVE COMMITTEE APPRECIATES YOUR EFFORTS, ENERGY, AND
21 TALENTS THAT YOUR COMMITTEE CERTAINLY CONTRIBUTES TO THIS
22 IMPORTANT WORK.

23 ANY QUESTIONS OF JUDY?

24 OKAY. AT THIS TIME, THEN, I'D LIKE TO CALL
25 UPON PAUL HATANAKA TO RESPOND -- TO GIVE US A STAFF

1 REVIEW AND ANY COMMENTS RELATIVE TO TESTIMONY IN THE
2 ISSUES. AND I THINK MAYBE WE WILL DO THIS IN ORDER.
3 FIRST, THE GMP. THEN -- SO WE -- NOW WE ARE FOCUSING ON
4 THE DISCUSSION OF THE GMP.

5 PAUL, PLEASE PROCEED.

6 MR. HATANAKA: THANK YOU, MR. PRESIDENT, AND
7 MEMBERS OF THE EXECUTIVE COMMITTEE. YOUR STAFF HAS BEEN
8 FRANTICALLY RUNNING AROUND COMPILING ALL THE LETTER
9 RESPONSES AND RESPONDING TO ALL THE LETTERS. WE RECEIVED
10 ONE THIS MORNING, WHICH WE WILL BE PASSING OUT TO YOU
11 SHORTLY CONCERNING THE GROWTH MANAGEMENT PLAN.

12 DURING THE PERIOD SINCE THE DECEMBER 15TH
13 EXTENSION OF THIS PLAN REVIEW, WE RECEIVED ABOUT 12
14 LETTERS, HALF OF THEM COMING TO US LATE IN THE PROCESS
15 AND MOST RECENTLY ONLY ONE LETTER CAME IN ABOUT A DAY
16 AGO. IN TERMS OF OUR REVIEW OF THE SUBSTANCE OF THE
17 LETTERS, MANY OF THE COMMENTS WERE DIRECTED TO THE
18 IMPLEMENTATION ISSUES CONCERNING THE JOB/HOUSING BALANCE
19 AND THE GROWTH MANAGEMENT PLAN. WE'VE RESPONDED TO EACH
20 OF THE COMMENTS, AND THEY ARE SUBMITTED TO YOU IN THE
21 PINK-COVERED REPORT WHICH -- EXCUSE ME -- THIS DOCUMENT
22 REPRESENTS THE FINAL ENVIRONMENTAL IMPACT REPORT. IT
23 CONTAINS ALL OF THE STAFF RESPONSES TO ALL OF THE LETTERS
24 RECEIVED THUS FAR.

25 IN ADDITION, WE DID HAVE A HANDOUT THIS



MORNING THAT INCLUDES ONE ADDITIONAL LETTER THAT WAS RECEIVED YESTERDAY; AND, AS I MENTIONED, WE RECEIVED A LATE LETTER THIS MORNING FROM THE SIERRA CLUB, THE L.A. CHAPTER. AND OUR STAFF IS PREPARED TO RESPOND TO THEM AND READ OUR STAFF RESPONSES INTO THE RECORD THIS MORNING.

SO WITH THAT, I'D LIKE TO CALL UPON VIVIAN DOCHE TO RESPOND SPECIFICALLY TO THOSE ISSUES.

CHAIRMAN GRIFFIN: ALL RIGHT. WILL YOU PLEASE NOTE IN THE RECORD THAT THESE LETTERS HAVE BEEN RECEIVED AND FILED?

MR. HATANAKA: AND I DO WANT TO EMPHASIZE TO THE EXECUTIVE COMMITTEE THAT NONE OF THE COMMENTS THAT WE'VE RECEIVED, IN STAFF'S JUDGMENT, IMPACT THE PLANS, THE FINDINGS OF THE FINAL ENVIRONMENT IMPACT REPORTS NOR THE CONCLUSIONS OF THE EIR IN OUR FINDINGS.

MS. DOCHE: GOOD MORNING. I AM VIVIAN DOCHE-BOULOS WITH THE GROWTH MANAGEMENT PLAN.

WE ALREADY HAVE RECEIVED A LETTER FROM MR. STEVEN KAUFMAN FROM THE SIERRA CLUB, AND IT ADDRESSES MOST OF THE COMMENTS THAT ARE FOUND IN THE LETTER WE RECEIVED TODAY. WE HAVE RESPONDED TO THOSE COMMENTS, AND THE RESPONSES ARE IN THE PACKAGE YOU HAVE.

THERE IS ONLY ONE AREA THAT IS A NEW ISSUE THAT WAS RAISED, AND IT'S IN REGARD TO THE MONITORING

PROCESS. IT IS SUGGESTED IN THIS LETTER THAT INSTEAD OF WAITING FIVE YEARS TO REEVALUATE ACHIEVEMENT OF PROGRESS TOWARD JOB/HOUSING BALANCE, THAT THIS BE DONE ON A YEARLY BASIS.

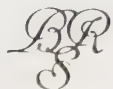
THE RESPONSE OF STAFF WOULD BE, FIRST, THAT THE MONITORING PROCESS WILL PROVIDE FEEDBACK TO THE IMPLEMENTING AGENCIES. WE DO HAVE MECHANISMS SUCH AS AB-95 AND THE RTP WHICH WILL PROVIDE OR INFLUENCE THE IMPLEMENTATION OF THE JOB/HOUSING BALANCE. BUT WE ALSO WOULD LIKE TO ADD THAT THE STAFF FEELS THAT A YEAR IS TOO SHORT A TIME FOR THE IMPLEMENTATION TO SHOW ANY RESULT, AND ENFORCEMENT OF AN IMPLEMENTATION OF ANY MEASURE REQUIRES A LITTLE MORE TIME TO PRODUCE ANY TANGIBLE MEASURABLE RESULTS.

MOST OF THE COMMENTS, AS I SAID BEFORE, HAVE ALREADY BEEN ADDRESSED.

THE LETTER I HAVE HERE COMMENDS US FOR CHANGES ALREADY MADE IN RESPONSE TO PREVIOUS COMMENTS RECEIVED FROM THE SIERRA CLUB. SO THIS IS VERY BRIEFLY WHAT THE LETTER IS AND OUR RESPONSE.

CHAIRMAN GRIFFIN: THANK YOU. ANY QUESTIONS OF VIVIAN? THANK YOU, VIVIAN.

MR. HATANAKA: I BELIEVE THERE WERE SOME ENVIRONMENTAL IMPACT COMMENTS AS WELL, AND OUR CONSULTANT, IRA SALATAN WITH JONES AND STOKES IS



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1 AVAILABLE TO COMMENT ON THOSE AS WELL.

2 MR. SALATAN: THANK YOU. I'LL JUST BE
3 RESPONDING TO THOSE FEW COMMENTS FROM SIERRA CLUB THAT
4 REFER TO FINDINGS THAT ARE RELATED TO THE DRAFT, EIR,
5 THAT WE PREPARED FOR SCAG. THE COMMENTS DEAL WITH TWO
6 ISSUE AREAS. THE FIRST BEING SOLID WASTE, AND THE SECOND
7 BEING BIOLOGICAL IMPACTS IN THE REGION.

8 THE TWO COMMENTS ADDRESSING SOLID WASTE,
9 ONE EXPRESSES A CONCERN THAT THERE MAY BE A PREFERENCE
0 FOR EXPANDING EXISTING LANDFILLS OR DEVELOPING NEW
1 LANDFILLS BEFORE EXPLORING OPTIONS SUCH AS RECYCLING,
2 REUSE, AND RESOURCE RECOVERY PROGRAMS. THAT'S NOT OUR
3 INTENTION. WE SIMPLY LISTED THE MITIGATION MEASURES.
4 AND I JUST WANTED TO CLARIFY THAT A -- NO PRIORITY ORDER
5 IS IMPLIED IN THE LISTING. THE FACT THAT A MEASURE IS
6 LISTED THIRD, DOESN'T INDICATE THAT IT'S LESS IMPORTANT
7 THAN THOSE LISTED BEFORE IT. AND I THINK THE LANGUAGE OF
8 THE DRAFT DOCUMENT IN THE FINDING DOESN'T SUGGEST
9 ANYTHING TO THAT EFFECT.

10 ALSO THE SIERRA CLUB WANTS TO MAKE IT
11 CLEAR, AND WE REALIZE THIS, THAT THE REGIONAL WASTE
12 MANAGEMENT PLANS MAY HAVE BEEN DEVELOPED OR PREPARED BUT
13 HAVE NOT, NECESSARILY, BEEN ADOPTED. AND, AGAIN, I
14 LOOKED AT THE DRAFT, EIR, AND THAT'S NOT SUGGESTED, SO I
15 DON'T THINK THERE'S ANY INCONSISTENCY THERE.



1 THE COMMENTS DEALING WITH BIOLOGICAL
2 IMPACTS. THE QUESTION IS RAISED AS TO WHETHER PROTECTION
3 OF SIGNIFICANT HABITATS, WHICH IS MENTIONED AS A
4 MITIGATION MEASURE, WOULD INCLUDE ALL SUCH AREAS IN LOS
5 ANGELES COUNTY. AND, INDEED, IT WOULD. ALSO THE OTHER
6 COMMENTS ON BIOLOGICAL IMPACTS ESSENTIALLY SUPPORT
7 MITIGATION MEASURES THAT ARE IDENTIFIED IN THE DRAFT,
8 EIR, AND ARE INCLUDED IN THE FINDINGS, AND THEY URGE THAT
9 THOSE MEASURES BE IMPLEMENTED.

10 I THINK THE LANGUAGE IS CONSISTENT. IT
11 ENCOURAGES LOCAL JURISDICTIONS TO CONSIDER POLICIES WHICH
12 WOULD PROTECT HABITATS AGAINST FRAGMENTATION OR LOSS OF
13 SUCH HABITATS. SO I THINK THEY ARE ESSENTIALLY
14 SUPPORTING MITIGATIONS THAT ARE PROPOSED IN THE EIR.

15 THOSE ARE MY RESPONSES TO THE RELEVANT
16 COMMENTS ON THE FINDINGS.

17 CHAIRMAN GRIFFIN: ANY QUESTIONS? THANK YOU
18 VERY MUCH.

19 MR. HATANAKA: THAT CONCLUDES OUR REPORT TO THE
20 EXECUTIVE COMMITTEE THIS MORNING.

21 CHAIRMAN GRIFFIN: ANY FURTHER COMMENTS OF STAFF
22 ON THE OMP? ALL RIGHT. AT THIS TIME WE ARE OPEN FOR
23 DISCUSSION.

24 AS YOU SAW IN YOUR PACKETS, YOU HAVE TWO
25 RECOMMENDED RESOLUTIONS; ONE DEALING WITH THE

1 CERIFICATION OF THE EIR, AND THE SECOND WHICH WOULD DEAL
2 WITH THE SUBSTANCE OF THE ADOPTION OF THE GMP.

3 WE'RE OPEN FOR DISCUSSION. WHAT IS YOUR
4 PLEASURE?

5 MS. REED: I JUST WANT TO MAKE ONE COMMENT FOR
6 THE ENVIRONMENT AND ENERGY COMMITTEE ON THIS FREEWAY
7 DELETION BUSINESS. I DON'T BELIEVE THAT COMMITTEE WOULD
8 MAKE A RECOMMENDATION IF THE PLAN HAD LEGALLY -- IF WE
9 HAD BEEN LEGALLY REQUIRED TO ADOPT IT TODAY, BUT THEY
0 ENTERTAINED THE MOTION AND MADE THE RECOMMENDATION
1 KNOWING THAT THERE WOULD BE PLENTY OF TIME TO ANALYZE
2 THEIR RECOMMENDATION IF THE COMMITTEE CHOSE TO DO IT. I
3 WANT TO SET THAT CONTEXT FOR YOU.

4 THE CITY OF LAGUNA BEACH ARE FULL
5 PARTICIPANTS IN THE ENERGY AND ENVIRONMENT COMMITTEE. IN
6 FACT, THEIR MAYOR IS CHAIRING PRESENTLY. AND AS LONG AS
7 I'VE BEEN A MEMBER OF THAT COMMITTEE -- IT'S BEEN A LONG
8 TIME THAT I'VE BEEN A MEMBER, MORE THAN 10 YEARS -- IT'S
9 BEEN A LONG TIME SINCE ANY CITY IN ORANGE COUNTY OR THE
0 COUNTY ITSELF HAS EVER PARTICIPATED IN THAT PARTICULAR
1 COMMITTEE.

2 COMMITTEE MEMBERS RESPONDED ONLY FROM THE
3 ENVIRONMENTAL STANDPOINT AND DID NOT HAVE ANY
4 TRANSPORTATION INFORMATION BEFORE IT AND FELT, I THINK,
5 THAT THEY WOULD GET THAT INFORMATION -- IF THE EXECUTIVE

1 COMMITTEE HAS ANY MERIT -- AND I THINK THAT WE WOULD
2 ESSENTIALLY GET BOTH SIDES OF THE STORY. AND I THINK THE
3 COMMITTEE HAS BEEN DISPARAGED UNDULY. AND I WANTED TO
4 DEFEND IT A LITTLE AS A FORMER CHAIR OF THAT COMMITTEE
5 AND A PERSON WHO WAS PRESENT AT THE DISCUSSION.

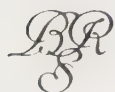
6 CHAIRMAN GRIFFIN: JUST A QUICK COMMENT. THAT
7 PARTICULAR ISSUE IS RELATIVE TO THE RMP, REGIONAL
8 MOBILITY PLAN. I, TOO, WOULD LIKE TO MAKE A COUPLE OF
9 COMMENTS, BUT I'D LIKE TO RESERVE THE COMMENTS UNTIL WE
10 GO OVER THE PARTICULAR REGIONAL MOBILITY PLAN WITH REGARD
11 TO THAT SPECIFIC POINT.

12 MR. GOSNELL: I JUST HAVE ONE PARTICULAR
13 QUESTION. HAVE YOU CLOSED THE PUBLIC HEARING?

14 CHAIRMAN GRIFFIN: PUBLIC HEARING IS CLOSED.

15 MR. WAGNER: I'D LIKE TO ADDRESS, FIRST OF ALL,
16 THE RECOMMENDATIONS OF THE RAC. I THINK THESE ARE --
17 THESE ARE, BASICALLY, YOU KNOW, VERY GOOD RECOMMENDATIONS
18 AND DO US A REAL SERVICE IN TERMS OF POINTING OUT WHERE
19 THE RAC BELIEVES WE CAN DO SOME THINGS MOST EFFECTIVELY
20 IN THIS AMENDED PLAN. BUT I DON'T -- I THINK THAT WHAT
21 THESE ITEMS ADDRESS, ALONG WITH BASICALLY A LOT OF THE
22 OTHER LETTERS, ARE ISSUES OF IMPLEMENTATION. AND I DON'T
23 THINK WE REALLY NEED TO MODIFY THE PLAN TO DEAL DIRECTLY
24 WITH THOSE KINDS OF ISSUES.

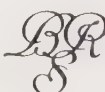
25 BASICALLY, THOSE KINDS OF THINGS, AND WHAT



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1 THEY'RE POINTING OUT HERE. ARE REALLY WHAT IS GOING TO BE
 2 EVOLVING IN THE SHORT TERM AS WE START LOOKING AT THE
 3 PLAN; LOOKING AT THE ISSUES OF REALLY HOW TO IMPLEMENT
 4 SOME OF THE SUGGESTIONS IN MORE DETAIL AND WHAT AREAS TO
 5 PUT MORE EMPHASIS ON. AND EVEN TO TALK IN A MUCH MORE
 6 BROADER SENSE, TO TALK ABOUT LOOKING AT SPECIFIC AREAS OF
 7 LEGISLATION THAT MIGHT HAVE TO BE CHANGED IN ORDER TO
 8 BRING ABOUT THE IMPLEMENTATION.

9 SO I THINK ON THAT BASIS, IT SEEMS TO ME,
 10 THAT ALL WE NEED TO DO IS ACKNOWLEDGE THESE LETTERS AND
 11 MAKE THEM A PART OF THE RECORD SO THAT THE
 12 RECOMMENDATIONS ARE NOT LOST, AND THEN GO AHEAD AND
 13 PROCEED WITH IMPLEMENTATION OF THE PLAN ITSELF. AND JUST
 14 SO WE CAN START ON SOMETHING SPECIFIC, I WOULD LIKE TO
 15 MAKE A MOTION THAT WE DO THAT. SPECIFICALLY, I WOULD
 16 MOVE THEN THAT WE -- DO YOU WANT TO SAY "THE RESOLUTION"?

17 MR. LENNARD: MR. PRESIDENT.

18 CHAIRMAN GRIFFIN: ON PAGE 16, ELMER, IS THE EIR
 19 RESOLUTION, WHICH YOU WOULD WANT TO CONSIDER PRIOR TO THE
 20 OTHER.

21 MR. WAGNER: RIGHT. WHAT I WOULD LIKE TO -- YOU
 22 WANT TO MAKE AND ACCEPT THE MOTION?

23 MR. LENNARD: I CAN READ THE TITLE OF THE
 24 RESOLUTION SINCE WE'RE ADOPTING A FORMAL PLAN.

25 MR. WAGNER: OKAY. NOW, I WOULD LIKE TO KNOW

1 THE LETTERS THAT WE'VE GOTTEN. ARE THEY INCLUDED IN THE
 2 RESOLUTION?

3 MR. LENNARD: THEY'RE ALL PART OF THE RECORD.
 4 THEY ARE ALL PART OF THE RECORD.

5 MR. WAGNER: OKAY. THEN I WOULD MOVE, THEN,
 6 THAT WE ADOPT --

7 MR. LENNARD: DO YOU WANT ME TO READ THE TITLE
 8 OF THE RESOLUTION?

9 CHAIRMAN GRIFFIN: LET HIM MAKE THE MOTION. SEE
 10 WHAT HE WANTS TO DO.

11 MR. WAGNER: WELL, I MOVE THAT WE ADOPT THE
 12 RESOLUTION CERTIFYING THE FINAL GMP EIR.

13 CHAIRMAN GRIFFIN: ALL RIGHT. WE WOULD ASK THAT
 14 THAT BE READ BY TITLE ONLY, AND I WOULD LIKE TO ASK OUR
 15 LEGAL COUNSEL TO READ BY TITLE ONLY.

16 MR. LENNARD: I'LL READ THE TITLE, AND THEN
 17 YOU'LL NEED ANOTHER MOTION WAIVING THE READING OF THE
 18 RESOLUTION.

19 THE RESOLUTION OF THE SOUTHERN CALIFORNIA
 20 ASSOCIATION OF GOVERNMENTS FOR CERIFICATION OF THE FINAL
 21 ENVIRONMENTAL IMPACT REPORT PREPARED FOR THE 1988 GROWTH
 22 MANAGEMENT PLAN. THEN YOU'LL NEED A MOTION --

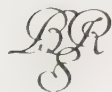
23 UNIDENTIFIED SPEAKER: -- MOVE TO WAIVE FURTHER
 24 READING.

25 CHAIRMAN GRIFFIN: A WAIVE AND A SECOND.



1 ALL RIGHT. SO YOU COMPLETED THAT. ANY
2 DISCUSSION ON THE RESOLUTION FOR EIR CERTIFICATION?
3 MR. JOHNSON: WE HAVE TO VOTE ON WAIVING FURTHER
4 READING FIRST?
5 CHAIRMAN GRIFFIN: YEAH.
6 MR. LENNARD: NO. IT'S WAIVED AND ADOPTED AT THE
7 SAME TIME.
8 CHAIRMAN GRIFFIN: OKAY.
9 MR. WALKER: I JUST WANT TO CLARIFY THAT CONCERN
10 ABOUT THE SUBSTANCE OF THE PLAN.
11 CHAIRMAN GRIFFIN: ALL RIGHT. WAS THERE ANYBODY
12 ON THIS SIDE -- ANYBODY ELSE ON THE CERIFICATION OF THE
13 EIR?
14 ALL RIGHT. WE'LL THEN HAVE A ROLL CALL
15 WITH REGARD TO THE CERIFICATION OF THE EIR, AND COULD WE
16 HAVE OUR SECRETARY OR SOMEBODY FROM STAFF THAT CAN HELP
17 ME?
18 ALL RIGHT. I WOULD LIKE TO DO THIS BY ROLL
19 CALL, PLEASE.
20 MR. MORET: I WILL DO IT.
21 COUNCILWOMAN JUDY NIEBURGER.
22 MS. NIEBURGER: AYE.
23 MR. MORET: COUNCILMAN JOHN MELTON.
24 MR. MELTON: YES.
25 MR. MORET: COUNCILMAN SMITH.

1 MR. SMITH: AYE.
2 MR. MORET: COUNCILMEMBER JUDY WRIGHT.
3 MS. WRIGHT: NO. NO.
4 CHAIRMAN GRIFFIN: NO. NO. SHE'S NOT VOTING.
5 MR. MORET: COUNCILMEMBER BOB WAGNER.
6 MR. WAGNER: AYE.
7 MR. MORET: COUNCILMEMBER TIM JOHNSON.
8 MR. JOHNSON: AYE.
9 MR. MORET: COUNCILMEMBER ELMER DIGNEO.
10 MR. DIGNEO: AYE.
11 MR. MORET: COUNCILMEMBER PEGGY SARTOR.
12 MS. SARTOR: SINCE ELMER AND I -- I WILL
13 ABSTAIN.
14 MR. MORET: OKAY. SUPERVISOR WALKER.
15 MR. WALKER: AM I STILL VOTING AS AN ALTERNATE?
16 CHAIRMAN GRIFFIN: HE IS THE IMMEDIATE PAST
17 PRESIDENT AND HAS A VOTE, SO YOU ARE AN OFFICIAL
18 DESIGNATED AT THIS TIME.
19 MR. MORET: COUNCILMEMBER GLORIA MOLINA.
20 MS. MOLINA: AYE.
21 MR. MORET: SUPERVISOR MIKELS.
22 MR. MIKELS: AYE.
23 MR. MORET: COUNCILMEMBER REED.
24 MS. REED: YES.
25 MR. MORET: MARK PISANO.



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1 MR. PISANO: YES.

2 CHAIRMAN GRIFFIN: ALL RIGHT. WE HAVE APPROVED
3 OR CERTIFIED THE EIR.

4 THE SECOND MOTION, THAT IS, TO IDENTIFY
5 STAFF IS FOUND ON PAGE 18 AND DEALS WITH THE SUBSTANCE OF
6 THE GROWTH MANAGEMENT PLAN AND IS OPEN FOR DISCUSSION.

7 MR. JOHNSON: I MOVE STAFF RECOMMENDATION.

8 MR. WAGNER: SECOND.

9 CHAIRMAN GRIFFIN: MOTION AND SECOND.

10 GLORIA, THEN JUDY.

11 MS. MOLINA: BECAUSE ALL THESE PLANS ARE
12 INTERRELATED ALONG WITH THE AQMP PLAN, IS THERE -- I'M
13 NOT SURE -- AS FAR AS PLANNING INTO THESE AREAS, SHOULD
14 WE WAIT TO DO IT ALL TOGETHER OR -- BECAUSE WE ARE GOING
15 TO BE VOTING ON ANOTHER PLAN THE 17TH?

16 CHAIRMAN GRIFFIN: THE 17TH, WE WOULD DEAL WITH
17 THE GMP.

18 MS. MOLINA: I'M JUST READING -- AS I GO THROUGH
19 ALL OF THIS -- IN READING IT ALL, IT TALKS ABOUT THEM
20 BEING SO INTERRELATED.

21 CHAIRMAN GRIFFIN: MARK, YOU MIGHT WANT TO
22 ADDRESS THAT.

23 MR. PISANO: COUNCILWOMAN MOLINA, YOUR LAST
24 QUESTION RELATES TO MY COMMENTS AT THE VERY BEGINNING OF
25 THE MEETING. ON MARCH 17TH, WHAT WE WILL BE DOING IS --

1 AS A COMMITTEE -- IS DECIDING WHAT PORTIONS OF THE GROWTH
2 PLAN, WHAT PORTIONS OF THE MOBILITY PLAN, AND THEN
3 THERE'S SOME OTHER AREAS WHERE LOCAL GOVERNMENT HAS
4 RESPONSIBILITY LIKE ENERGY CONSERVATION. WE WILL BE
5 DETERMINING WHAT INTEGRATED PORTIONS OF THOSE PLANS
6 SHOULD BE A PART OF THE AIR QUALITY PLAN.

7 THE ACTION TODAY IS WHAT IS THE BASE PLAN
8 FOR GROWTH MANAGEMENT FOR THE REGION? AND WHAT IS BASE
9 PLAN FOR MOBILITY FOR THE REGION? AND THE GROWTH PLAN IS
10 A PIECE OF THE MOBILITY PLAN, IT'S ALSO -- WE WILL DECIDE
11 AT THAT LATER DATE WHAT PORTION WE BRING INTO AIR PLAN.
12 THE GROWTH PLAN ALSO SERVES A NUMBER OF OTHER PURPOSES
13 ASIDE FROM AIR QUALITY, SO THE DECISION TODAY IS WHAT'S
14 THE EXECUTIVE COMMITTEE'S POSITION ON THE OVERALL GROWTH
15 MANAGEMENT?

16 THE DECISION BEFORE THE BOARD RIGHT NOW IS
17 WHAT IS THE EXECUTIVE COMMITTEE'S POSITION ON THIS PLAN?

18 MS. MOLINA: I UNDERSTAND THAT. BUT I DON'T
19 THINK THE RESOLUTION SAYS THAT. DOES IT?

20 MR. LENNARD: IT DOESN'T -- IT DOESN'T HAVE TO
21 FOR TODAY'S PURPOSE, SINCE YOU'LL BE TAKING ANOTHER
22 ACTION WHEN YOU CONSIDER THE ADOPTION OF AQMP. YOU'LL
23 GET INTO A LOT OF THE COMPLEXITIES IF YOU LEAVE THIS
24 ADOPTION TO THE SAME TIME AS THE ADOPTION OF AQMP.

25 CHAIRMAN GRIFFIN: JUDY NIEBURGER.



1 MS. NIEBURGER: THERE WAS QUITE A POINT MADE IN
2 THE VERY BEGINNING THAT WE WERE GOING TO USE JOB/HOUSING
3 RATIOS RATHER THAN -- NOW THERE ARE TWO DIFFERENT PAGES
4 AND THEY HAVE TWO DIFFERENT NUMBERS -- THIS ONE HAS ONE
5 SET OF NUMBERS AND THEN YOU GO TO -- I IMAGINE, THIS
6 NEEDS TO BE REVISED. I WAS ON PAGE -- I GUESS, THAT WAS
7 90. AND THEN IF YOU GO BACK TO PAGE 90 -- I THINK THESE
8 ARE REVISIONS -- THERE ARE DIFFERENCES IN THE NUMBER, AND
9 I WAS JUST ASKING WHICH RATIO WE WERE ACTUALLY ADOPTING.

0 CHAIRMAN GRIFFIN: STAFF?

1 MR. SHERWOOD: THE ONES THAT WE ARE RECOMMENDING
2 TO BE ADOPTED ARE THE REVISED ONES ON PAGES -- I CAN'T
3 READ -- 109, 105 -- PAGE 6-14. IT'S THE LATER ONES,
4 JUDY.

5 MS. NIEBURGER: IS THAT BASICALLY WHAT IS ON
6 PAGE 99?

7 MR. SHERWOOD: RIGHT. RIGHT.

8 MS. NIEBURGER: TWO OTHER THINGS. ON HERE ON
9 PAGE 119, IT'S TALKING ABOUT THAT IF JURISDICTIONS WISH
0 TO APPROVE PROJECTS THAT DO NOT NEED CONFORMANCE, THAT
1 CONDITIONAL PERMITS MIGHT BE REQUIRED.

2 NOW MY QUESTION IS, WHO WOULD ISSUE THE
3 CONDITIONAL PERMITS? AND WHO MAKES THAT JUDGMENT? DOES
4 THAT COME BEFORE SCAG TO DO THAT?

5 MR. SHERWOOD: NO. THAT IS THE LOCAL

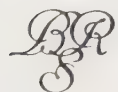
1 JURISDICTIONS. WE'RE MAKING SUGGESTIONS HERE AS TO WHAT
2 LOCAL JURISDICTIONS MAY WANT TO DO WITH THE POLICY.

3 MS. NIEBURGER: SO THAT WOULD BE UP TO THEM TO
4 DECIDE WHAT THE CONDITIONAL PERMITS WOULD BE FOR THEIR
5 OWN JURISDICTIONS?

6 MR. SHERWOOD: RIGHT.

7 MS. NIEBURGER: OKAY. THEN JUST A FINAL ONE IS
8 THAT WE WERE TALKING ABOUT LOCAL JURISDICTION'S ADOPTION
9 OF MEASURES AND ORDINANCES FOR JOB/HOUSING BALANCE
10 TARGETED FOR JANUARY 1, 1990. AND MY QUESTION ON THAT
11 IS, IS THAT REALISTIC? BECAUSE I THINK THE PLAN, AS A
12 WHOLE, HAS A LOT OF SUBSTANCE AND MERIT TO IT. I WOULD
13 ALMOST GUARANTEE YOU THAT 95 PERCENT OF THE JURISDICTIONS
14 THAT WOULD BE AFFECTED BY IT, HAVE NOT READ IT NOR DO
15 THEY UNDERSTAND IT. PROBABLY SOME OF THEM WON'T BUY INTO
16 IT ANYWAY. SO HOW DO WE IMPLEMENT ANYTHING BY 1990?
17 JANUARY 1ST OF 1990? YOU'RE ONLY TALKING ABOUT ELEVEN
18 MONTHS AWAY. DOES THAT MEAN AN EDUCATION PROGRAM, A
19 PROGRAM TO GET -- EXCUSE ME -- JURISDICTIONS TO BUY INTO
20 IT? AND IS THAT REALLY REALISTIC?

21 MR. SHERWOOD: I GUESS IT'S FOR YOU TO DETERMINE
22 HOW REALISTIC IT IS. IT IS STAFF'S PROPOSAL THAT WE TRY
23 TO GET THAT TO MAKE A MAJOR EFFORT OF EDUCATION AND
24 INFORMING LOCAL GOVERNMENTS WHAT REGIONAL POLICY WE ARE
25 ADOPTING. I THINK THAT IS ONE OF THE RELEVANT ISSUES AT



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1 THE MARCH 17TH MEETING ON THE AIR QUALITY PLAN. SINCE
2 THIS IS SCHEDULED TO COMPLY WITH THE AIR QUALITY PLAN
3 SCHEDULE, THAT IS AN ISSUE THAT REALLY NEEDS TO BE
4 DISCUSSED, I THINK, FURTHER WHEN YOU DISCUSS THE AIR
5 QUALITY PLAN.

6 MS. NIEBURGER: SO THAT IS MARCH? AT THAT
7 POINT, I AM JUST WONDERING -- BECAUSE I KNOW IN MY OWN
8 CITY YOU SEND OUT A FORM LIKE THIS, AND I WOULD PROBABLY
9 BE THE ONLY ONE WHO WOULD LOOK AT IT AND NOBODY ELSE
0 WOULD, SO THEY DON'T -- THE REST OF MY COUNCILMEMBERS
1 DON'T UNDERSTAND IT.

2 HOW ARE WE GOING TO DO AN OUTREACH PROGRAM
3 TO OTHER JURISDICTIONS, TO OTHER CITIES SO THAT THEY KNOW
4 WHAT THE PLAN IS? IS SCAG PLANNING ANYTHING LIKE THAT?
5 THAT WE ACTUALLY GET INTO REGIONS AND SUBREGIONS, AND
6 THEN MAYBE HAVE MEETINGS FOR INDIVIDUAL SUBGROUPS, YOU
7 KNOW, SMALLER MEETING-TYPE THINGS? I DON'T KNOW. I
8 DON'T KNOW HOW YOU DO IT. I DON'T KNOW REALLY HOW THAT
9 IS GOING DO BE IMPLEMENTED.

0 THAT'S BEEN MY QUESTION FROM DAY ONE. THAT
1 WE CAN PROPOSE ALL SORTS OF LOFTY GOALS, BUT HOW DO YOU
2 GET PEOPLE TO BUY INTO IT ESPECIALLY WHEN THEY DON'T KNOW
3 AND UNDERSTAND IT?

4 MR. SHERWOOD: I'D LIKE TO SAY, ONE, STAFF IS
5 PROPOSING A MAJOR EFFORT. SECOND, THE TASK FORCE, THAT

1 HAS BEEN PROPOSED. AND AT THE MARCH MEETING, GROWTH
2 MANAGEMENT AND TRANSPORTATION MEASURES WILL, HOPEFULLY,
3 HELP US TO SOLVE THE ISSUE JUST RAISED. AND I THINK I'D
4 ASK GIL SMITH TO TALK ABOUT WHAT OUR OWN PROGRAM IS AS
5 FAR AS OUTREACH TO JURISDICTIONS OVER THE NEXT FEW
6 MONTHS.

7 MS. NIEBURGER: CAN I JUST ASK --

8 CHAIRMAN GRIFFIN: SURE. MARK WOULD LIKE TO
9 RESPOND TO YOU --

10 MS. NIEBURGER: YOU'RE ALSO ASKING THAT THE
11 LOCAL JURISDICTIONS ACTUALLY ADOPT MEASURES TO DO THIS?
12 WE'RE TARGETING THAT --

13 MR. SHERWOOD: IT'S A TARGET --

14 MS. NIEBURGER: BUT KNOWING HOW LOCAL GOVERNMENT
15 TAKES SO MUCH TIME TO DO THINGS, YOU'RE TALKING ABOUT A
16 MAJOR PROPOSAL FOR SOME -- FOR CITY GOVERNMENT, AND I
17 DON'T THINK THEY'RE GOING TO BE READY TO GIVE YOU ANY
18 KIND OF AN ORDINANCE. I KNOW OUR CITY, PROBABLY THEY
19 WOULD HAVE TO HAVE A TASK FORCE OR A COMMITTEE TO DECIDE
20 WHAT THEY WERE GOING TO DO AND WHAT THEY WEREN'T GOING TO
21 DO. I DON'T SEE AN ORDINANCE COMING AS OF JANUARY 1ST.
22 I GUESS, THAT'S MY PROBLEM. I KNOW HOW SLOW GOVERNMENT
23 WORKS, AND IT DOESN'T WORK THAT FAST.

24 CHAIRMAN GRIFFIN: OKAY. MARK, WOULD YOU LIKE
25 TO BE ABLE TO MAKE A RECOMMENDATION OR RESPONSE?



1 MR. PISANO: I THINK -- THE ISSUE THAT
2 COUNCILWOMAN NIEBURGER HAS RAISED IS. IN FACT, A QUESTION
3 OF WHAT -- THE MILESTONE THAT LOCAL GOVERNMENT WILL BE
4 REQUIRED TO ACT ON IS A WHOLE SERIES OF ISSUES. WE
5 SPECIFIED AS ONE YEAR FROM THE DATE OF ADOPTION.

6 THE QUESTION THE COUNCILMEMBER IS RAISING IS:
7 GIVEN THE FACT THAT WE HAVE DELAYED ADOPTION OF THE PLAN,
8 ERGO THE TIME WE SEND A SIGNAL TO LOCAL GOVERNMENT TO
9 BEGIN ACTIVITY, THERE HAS BEEN A 3-MONTH DELAY. I
10 INTERPRETED THE COMMENT TO READ THAT THERE BE A
11 MODIFICATION OF THE MILESTONES IN THE PLAN, I THINK THAT
12 IS FUNDAMENTALLY THE ISSUE.

13 LET ME JUST NOTE THAT WE HAVE NOT RAISED
14 THE ISSUE WITH THE DISTRICT. I THINK THE TIME PERIOD
15 WHEN THIS PARTICULAR ISSUE COULD BE ADDRESSED FOR AIR
16 QUALITY PURPOSES, WHERE THERE COULD BE A REQUIREMENT FOR
17 ACTIVITY, WOULD BE WHEN THE AIR QUALITY PLAN -- WHEN WE
18 DECIDE WHAT THE TRANSPORTATION ELEMENTS ARE FOR THE AIR
19 QUALITY PLAN. SO THE TIE-IN TO THE AIR QUALITY PLAN WILL
20 BE MADE ON MARCH 17TH. AND THAT GETS US TO THE QUESTION
21 OF WHAT THE RELATIONSHIP BETWEEN THOSE TWO PLANS ARE.

2 I DON'T BELIEVE THAT IN THE GROWTH
3 MANAGEMENT PLAN ITSELF, WE HAVE SPECIFIED THAT THESE
4 ORDINANCES NEED TO BE DONE. YOU KNOW, BY JANUARY 1, 1990.
5 THAT IS THE PROVISION STATED IN THE PLAN TO -- HELP ME

1 OUT ON THIS, ARNIE -- I DON'T BELIEVE WE HAVE THE
2 SCHEDULES.

3 MR. SHERWOOD: WE HAVE --

4 MR. PISANO: COULD WE -- THE BOTTOM LINE -- JUST
5 SAY -- SPECIFY THE LANGUAGE THEN TO SAY THAT THESE SHALL
6 COINCIDE WITH THE DATES THAT WE ESTABLISH THE ADOPTION OF
7 THE AIR QUALITY PLAN BECAUSE THAT'S WHERE WE'RE SETTING
8 THE TIME PERIOD? THE GROWTH MANAGEMENT PLAN LAYS OUT
9 THE FRAMEWORK.

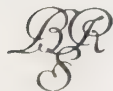
10 WOULD THAT BE A -- AND THEN WE BRING THIS
11 ISSUE -- AND THIS IS ONE OF THE ISSUES THAT WE WOULD
12 RAISE FOR PUBLIC DISCUSSION, WHEN WE HAVE YOU REVIEW AND
13 ADOPT THE AIR QUALITY PLAN.

14 MS. NIEBURGER: SO, I GUESS, MY QUESTION -- SO
15 THAT MY QUESTION IS: WHEN DO YOU HAVE IT AS A TARGETED
16 DATE? I KNOW THAT GIVES YOU MORE FLEXIBILITY, BUT THEN
17 WHEN DO YOU LOCK IN A DATE BECAUSE IN --

18 MR. PISANO: ON MARCH 17TH. WE WOULD ESTABLISH
19 WHAT THE DATE WOULD BE, MARCH 17TH. THE ISSUE THAT WE
20 ARE NOW RAISING WHEN WE ADOPT THESE PORTIONS OF THE AIR
21 QUALITY PLAN IS, CAN WE MAINTAIN THE JANUARY 1, 1990? OR
22 DO WE GO TO APRIL OR MARCH 30TH, 1990?

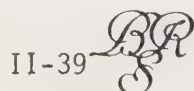
23 MS. NIEBURGER: DO YOU STILL HAVE THE DATE? OR
24 DO YOU CHANGE THE WORDING OF IT?

25 MR. PISANO: WE CHANGE THE LANGUAGE TO REFLECT



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1 THE DATE.

2 MR. MIKELS: YOU SAY WE HAVE DATES? WE ARE
3 GOING TO DO THE AIR QUALITY PLAN AND THEN WE COME BACK
4 AND MODIFY THE GROWTH MANAGEMENT PLAN?

5 MS. REED: NO, WE ARE GOING TO FINISH IT RIGHT
6 NOW.

7 CHAIRMAN GRIFFIN: THE DATES WILL BE ADJUSTED?
8 THAT'S A SUGGESTION.

9 NOW WHERE THERE'S NO MOTION YET, I'LL --

10 REPORTER: EXCUSE ME, MR. CHAIRMAN --

11 CHAIRMAN GRIFFIN: ALL RIGHT. WE HAVE IN
12 ORDER -- I HAVE BEFORE JUDY --

13 UNIDENTIFIED SPEAKER: CAN WE HAVE ONE BREAK
14 HERE FOR THE REPORTER?

15 REPORTER: I'M OUT OF PAPER.

16 CHAIRMAN GRIFFIN: DO YOU WANT TO HOLD YOUR
17 COMMENTS?

18 MS. REED: JOHN WANTS TO KNOW WHO YOU ARE
19 REPORTING FOR?

20 CHAIRMAN GRIFFIN: WE WANT TO KNOW WHO ARE YOU
21 REPORTING FOR?

22 REPORTER: MR. HATANAKA.

23 CHAIRMAN GRIFFIN: OH, YOU'RE WORKING FOR US.

24 ARE YOU THROUGH? ALL RIGHT.

25 REPORTER: OKAY. THANKS.

1 CHAIRMAN GRIFFIN: IN ORDER I HAVE -- JUDY, ARE
2 YOU THROUGH? I HAVE LARRY, THEN BOB AND CHRIS AND TIM.

3 MR. WALKER: OKAY. IT'S NOT ABOUT THE DATES,
4 BUT I JUST WANTED TO MAKE SOME COMMENTS ABOUT THE PLANS.

5 IN TERMS OF WHAT MY POSITION IS BECAUSE I
6 THINK TIM RAISED A GOOD POINT SOME MINUTES AGO REGARDING
7 WHETHER OR NOT TO VOTE FOR THE GROWTH MANAGEMENT PLAN, WE
8 ARE ABOUT TO END UP WITH AN AIR QUALITY PLAN THAT DOESN'T
9 ESTABLISH AIR QUALITY. A REGIONAL MOBILITY PLAN THAT'S
10 NOT GOING TO BRING MOBILITY TO THE REGION, AND A GROWTH
11 MANAGEMENT PLAN THAT DOES NOT MANAGE GROWTH. AND YET
12 THERE'S A LOT OF VERY POSITIVE WORK THAT'S BEEN DONE.

13 SO I'M TRYING TO FIGURE OUT HOW TO VOTE IN
14 A WAY THAT EXPRESSES MY DISSATISFACTION WITH SOME OF THE
15 UNDERLYING ASSUMPTIONS, AND YET SUPPORTS THE MAJOR STEPS
16 FORWARD THAT WE ARE TAKING. BECAUSE WE HEAR A LOT OF
17 COMPLAINTS FROM THE VARIOUS SOURCES, ALTHOUGH, I MUST SAY
18 THE SIERRA CLUB AND THE REGIONAL ADVISORY COUNCIL HAS HAD
19 SOME POSITIVE CONTRIBUTIONS IN TODAY'S DISCUSSION, AND I
20 THINK THAT'S A GOOD SIGN. A LOT OF WHAT WE HEAR FROM
21 OUTSIDE THIS BODY IS THAT WE'RE TRYING TO DO TOO MUCH.
22 WE'RE GOING TOO FAR. HISTORY IS GOING TO LOOK BACK TO
23 THIS TIME AND SAY WE ARE NOT GOING FAR ENOUGH.

24 AT THE FEDERAL LEVEL, WE TALK ABOUT A
25 DEFICIT. THAT WE ARE MORTGAGING THE FUTURE OF OUR



1 CHILDREN AND GRANDCHILDREN. I HAVE A FEELING,
2 ENVIRONMENTALLY, WE ARE RUNNING AT A DEFICIT. I DON'T
3 THINK THAT THESE PLANS SOLVE THE DEFICIT THAT WE ARE
4 RUNNING ENVIRONMENTALLY. THERE MAY BE AS MUCH PROGRESS
5 AS WE CAN AFFORD TO MAKE ON AN INTERIM BASIS, BUT THE
6 BASIC PROBLEM I HAVE WITH THIS WHOLE THING -- AND I AGREE
7 WITH TIM -- IS THE NUMBERS THAT WE TALKED ABOUT IN THE
8 GROWTH MANAGEMENT PLAN ARE SIMPLY NOT SUSTAINABLE IN THE
9 L.A. BASIN.

10 AND I WOULD PREFER TO VOTE NO ON THIS NOW,
11 AND I WOULD PREFER TO SEND THEM BACK FOR SOME REWORK AND
12 STILL FIND SOME WAY TO ADOPT THE REGIONAL MOBILITY AIR
13 QUALITY PLANS SO WE CAN BEGIN THE PROCESS, WHICH I THINK
14 WILL DEMONSTRATE THE COST OF THE GROWTH MANAGEMENT PLAN
15 WE'RE TALKING ABOUT HERE. BECAUSE EVERYONE WANTS TO TALK
16 ABOUT THE COST OF THE REGULATIONS AND THE COST OF THE
17 ACTIVITY THAT WE ARE TALKING ABOUT IMPOSING. WE GET VERY
18 LITTLE ABOUT THE COST OF TRYING TO ALLOW THIS KIND OF
19 GROWTH IN THIS REGION.

20 THERE ARE COSTS ASSOCIATED WITH DOING AND
21 THERE ARE COSTS ASSOCIATED WITH NOT DOING. AND NOT DOING
22 ANYTHING AND HAVING THIS LEVEL OF GROWTH OCCUR HAS
23 PROBABLY A HIGHER PRICE TAG THAN ANY OF THE RESULTS THAT
24 WE'RE TALKING ABOUT. SO I'M GOING TO SUGGEST A NO VOTE
25 ON THE GROWTH MANAGEMENT PLAN, AND A YES VOTE ON THE

1 REGIONAL MOBILITY PLAN. I'LL LEAVE IT WITH THAT.

2 CHAIRMAN GRIFFIN: ALL RIGHT. BOB, AS CHAIRMAN
3 OF THE CEHD, WOULD YOU LIKE TO RESPOND TO THAT?

4 MR. WAGNER: YEAH. LET ME RESPOND.

5 I CAN UNDERSTAND THE CONCERNS THAT PEOPLE
6 HAVE AS TO WHETHER OR NOT THESE PLANS CAN BE IMPLEMENTED.
7 AND WHETHER OR NOT EVEN IMPLEMENTED IF THESE PLANS WILL
8 ACTUALLY DO THE JOB. BUT A LOT OF EFFORT HAS GONE INTO
9 THE PLANS. THE PLANS DEFINITELY INDICATE ACTION IN A
10 POSITIVE DIRECTION IN TERMS OF SOLVING THE PROBLEMS THAT
11 WE'RE DEALING WITH. TO CONTINUALLY DEFER IMPLEMENTING
12 THESE PLANS, THOUGH, I THINK IS SOMETHING WHICH, IN
13 ESSENCE, WILL TEND TO PARALYZE THE ENTIRE AREA. WE CAN
14 DEBATE THESE PLANS IN THE SAME WAY THAT THIS AREA OR THIS
15 REGION OR THIS COUNTY DEBATED THE TRANSPORTATION-TYPE
16 ISSUES, RAPID TRANSIT.

17 WHEN I MOVED OUT HERE IN 1981, I WAS TOLD
18 AT THAT TIME THAT THIS ISSUE HAD BEEN STUDIED OVER AND
19 OVER AND OVER, AND THEY NEEDED TO TAKE SOME ACTION ON IT.
20 IT'S BEEN A LONG TIME SINCE I'VE BEEN HERE. WE HAVEN'T
21 SEEN ANYTHING POSITIVE IN THE AREA IN THAT REGARD UP
22 UNTIL, ACTUALLY, FAIRLY RECENTLY. AND THERE'S EVEN
23 QUESTIONS RAISED BY MANY PEOPLE AS TO WHETHER OR NOT THE
24 DIRECTION WE'RE GOING NOW IS APPROPRIATE.

25 I THINK THAT IT WAS ONCE -- I THINK THAT



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1 THE HARVARD SCHOOL OF BUSINESS ONCE SAID THAT ONE OF THE
2 PRIMARY THINGS THAT YOU HAVE TO DO -- OR ONE OF THE MAJOR
3 THINGS THAT YOU HAVE TO DO WHEN YOU'RE ADDRESSING AN
4 ISSUE IS TO TAKE AN ACTION. THE ACTION CAN ALWAYS BE
5 MODIFIED AND CAN BE REDIRECTED. BUT IF YOU DON'T TAKE
6 THE ACTION -- IF YOU DON'T TAKE AN ACTION, THEN YOU
7 ESSENTIALLY DO EXACTLY WHAT I SAID BEFORE; YOU
8 ESSENTIALLY PARALYZE THE ENTIRE PROCESS.

9 I THINK THAT THAT'S THE SITUATION THAT WE'RE
10 IN. EITHER WE TAKE SOME ACTION, AND WE TAKE IT NOW.
11 WE'VE STUDIED THIS THING VERY EXTENSIVELY. I DON'T THINK
12 THERE'S ANYBODY THAT SAYS THAT WHAT IS IN THESE PLANS IS
13 PERFECT, BUT THERE IS TREMENDOUS FLEXIBILITY HERE. WE
14 HAVE A MONITORING PROCESS SET UP. WE HAVE AN
15 IMPLEMENTATION PROCESS SET UP, ALL OF WHICH ALLOW FOR THE
16 REDIRECTION OF THESE PLANS. WE'VE GOT ACTUALLY MORE THAN
17 THAT. WE HAVE GOT A LOT OF PEOPLE SITTING IN THE
18 BACKGROUND JUST WAITING TO GO AND IMPLEMENT VERY SPECIFIC
19 LEGISLATION TO TRY TO BRING ABOUT THE RESOLUTION OF THIS
20 PROBLEM.

21 I THINK LOCAL GOVERNMENT IS FACED WITH
22 MAJOR ISSUES RIGHT NOW WHICH IN THE -- IF THEY'RE NOT
23 HANDLED BY LOCAL GOVERNMENT, CAN TOTALLY CHANGE THE
24 CHARACTER OF THE GOVERNING STRUCTURE IN THE AREA. IT'S
25 NECESSARY THAT WE GET INTO THE PROCESS OF TRYING TO MAKE

1 THESE PLANS WORK AND TRYING TO AVOID SOMETHING LIKE THAT
2 OCCURRING. WE CAN'T DO IT BY CONTINUALLY SENDING THESE
3 PLANS BACK FOR FURTHER REVIEW AND FURTHER REVISION.

4 I THINK THE PLANS ARE IN ADEQUATE SHAPE
5 RIGHT NOW TO MOVE FORWARD WITH THEM. AND I THINK THAT AS
6 FAR AS THE ISSUE OF THIS TIMING, I THINK IT'S A THING
7 THAT -- WHICH SHOULD JUST SIMPLY BE HANDLED WITH A MOTION
8 TO MODIFY THE TARGETED DATES IN THE PLAN, TO KEY THEM TO
9 ADOPTION OF THE AIR QUALITY MANAGEMENT PLAN AND MOVE
10 FORWARD FROM THAT.

11 SO I WOULD MOVE THAT WE -- THAT WE ALTER
12 THE TARGET PLAN -- THE TARGET DATE CONTAINED IN THE
13 GROWTH MANAGEMENT PLAN FOR IMPLEMENTATION TO REFLECT
14 DATES FOR IMPLEMENTATION OF THE AIR QUALITY MANAGEMENT
15 PLAN.

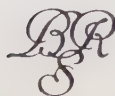
16 CHAIRMAN GRIFFIN: IMPLEMENTATION OR ADOPTION?

17 MR. WAGNER: WHAT I'M SAYING IS: LET'S MODIFY.
18 I JUST WANT TO MAKE A MOTION JUST TO MODIFY THE PLAN.
19 FIRST, TO KEY THE DATES FROM THE DATE OF THE ADOPTION OF
20 THE AIR QUALITY MANAGEMENT PLAN.

21 CHAIRMAN GRIFFIN: THAT WAS THE MOTION?

22 MR. WAGNER: THAT WAS THE MOTION.

23 MR. JOHNSON: WELL, I MADE THE ORIGINAL MOTION ON
24 THE -- ABOUT THE STAFF RECOMMENDATION ON THE FINAL GROWTH
25 MANAGEMENT PLAN, AND WHAT I WAS SUGGESTING WAS -- I'LL



1 JUST INCLUDE THAT IN MINE.

2 CHAIRMAN GRIFFIN: BECAUSE WE HAVE A MOTION AND
3 SECOND ON THE FLOOR, BOB.

4 MR. WAGNER: THAT'S FINE -- ACCEPTABLE.

5 MS. REED: SO THE AMENDMENT IS TO TIE THE
6 IMPLEMENTATION DATES IN THIS PLAN TO WHATEVER
7 IMPLEMENTATION DATES ARE ULTIMATELY PUT IN THE AIR
8 QUALITY PLAN, THEY WILL ALL BE THE SAME?

9 MR. JOHNSON: MAKE THEM THE SAME.

10 MR. WAGNER: I SAID ADOPTION OF THE AIR QUALITY
11 MANAGEMENT PLAN.

12 MS. REED: I SAID TO WHATEVER IMPLEMENTATION
13 DATES ARE ULTIMATELY PUT IN THE AIR QUALITY PLAN.

14 CHAIRMAN GRIFFIN: TRIGGERED FROM THE --

15 MS. NIEBURGER: YOU'RE BOTH SAYING SOMETHING
16 DIFFERENT.

17 CHAIRMAN GRIFFIN: WHAT'S TRIGGERED, AT LEAST AS
18 I'M HEARING -- AT LEAST AS I HEARD -- WHAT WOULD TRIGGER
19 THIS IS THE ADOPTION OF THE PLAN. IN OTHER WORDS, THIS
20 TIME EXTENSION WOULD OCCUR FROM THE DATE OF THE ADOPTION
21 OF THE PLAN, ASSUMING IT WAS TO BE ADOPTED ON MARCH 17TH
22 THEN THERE WOULD BE THAT MILESTONE, AS OPPOSED TO WHAT IS
23 SUGGESTED.

24 MS. NIEBURGER: WELL, IS THE DIFFERENCE IN THE
25 DATE OF IMPLEMENTATION OR OF ADOPTION?

1 MS. REED: (INAUDIBLE)

2 MS. NIEBURGER: OKAY. I JUST WANTED TO
3 CLARIFY --

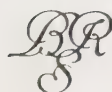
4 CHAIRMAN GRIFFIN: LET'S SEE, WE HAVE THE MOTION
5 AND SECOND.

6 LARRY, DO YOU WANT TO RESPOND OR ANYTHING
7 OR ARE YOU OKAY?

8 MR. WALKER: WELL, I THINK LOCAL GOVERNMENT IS
9 NOT DOING ITS JOB. I THINK STARTING WITH EVERYTHING THAT
10 LOCAL GOVERNMENT'S GOT PLANNED -- THAT BASIC NUMBER AND
11 THEN BUILDING EVERYTHING ON TOP OF THAT -- I CAN BE
12 RESPONSIVE TO ALL THE PROGRESSIVE ACTION I WANT TO DO IN
13 MY JURISDICTION REGARDING LAND USE AND REGARDING DENSITY
14 AND REGARDING IMPACTS ON THE REGION, BUT IN THREE OR FOUR
15 CITIES, PARTICULARLY TO THE EAST OF ME IN THIS AREA, IF
16 THEY ARE NOT CONSISTENT WITH THOSE VALUES, THEN THAT'S
17 NOT SOLVING THE PROBLEM. AND THIS HAS NOTHING TO DO WITH
18 THOSE NUMBERS.

19 I'M GOING TO VOTE NO. AND I DON'T THINK MY
20 ARGUMENT WAS, IN ANY WAY, RESPONDED TO BY THAT
21 DISCUSSION. I CERTAINLY CAN UNDERSTAND IF SOMEBODY --
22 BUT I DON'T THINK -- I DON'T KNOW THAT WE'RE DEALING
23 WITH, THE REAL ISSUE THAT IS CAUSING THE PROBLEM.

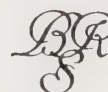
24 MR. PISANO: WITH RESPECT TO THE LAST COMMENTS
25 THAT SUPERVISOR WALKER MADE, JUST A POINT OF



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1 CLARIFICATION.

2 WE ARE NOT IN THE ADOPTION OF GROWTH
3 MANAGEMENT PLAN SPECIFYING SPECIFIC NUMBERS BY INDIVIDUAL
4 CITIES WITHIN SUBREGIONAL AREAS THAT WE HAVE IDENTIFIED.
5 WE HAVE SET TARGETS FOR THOSE SUBREGIONS. WE THEN HAVE
6 SET PERFORMANCE STANDARDS THAT HAVE TO BE ACHIEVED WITHIN
7 THE SUBREGIONS. THE WORK THAT NEEDS TO BE DONE IN THIS
8 FIRST YEAR OF ACTIVITY, AS CITIES DEVELOP THEIR GENERAL
9 PLANS, IS, IN FACT, TO WORK OUT THEIR AGREEMENTS AMONG
10 THE AREAS IN THE PLAN WHERE, IN FACT, THE PERFORMANCE --
11 THE GOALS -- THE PERFORMANCE STANDARDS ARE, IN FACT,
12 INCORPORATED INTO THE GENERAL PLANS AND GENERAL PLANS
13 WITHIN THE AREA, IN FACT, ARE CONSISTENT.

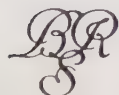
14 MR. WALKER: IN OUR SUBREGION, I'VE ADDED UP
15 EVERY JURISDICTION I CAN THINK OF, AND IT SEEMS CLEARLY
16 NEXT TO IMPOSSIBLE -- IT SEEMS EVIDENT THAT IF YOU TAKE
17 THE MAXIMUM NUMBER OF POPULATION THAT EACH AGENCY WOULD
18 HAVE -- WOULD ANTICIPATE AT THE HIGHEST POSSIBLE GENERAL
19 PLAN THAT THOSE WOULD ALL ADD UP WITHIN THE SCAG NUMBERS,
20 AND THOSE NUMBERS ARE GOING TO IMPOSE LEGAL REQUIREMENTS.
21 YOU'VE GOT A REAL PROBLEM BECAUSE YOU MAY HAVE AGENCIES
22 FIGHTING EACH OTHER. YOU MAY HAVE AGENCIES TRYING TO
23 STUFF NUMBERS ONTO EACH OTHER. I JUST THINK THE
24 UNDERLYING NUMBERS WERE ARRIVED AT, NOT IN A
25 WHAT-CAN-BE-HANDLED, WHAT-SHOULD-BE-DONE METHODOLOGY, BUT

1 HOW-BIG-DO-WE-THINK-THE-MAXIMUM-NUMBER-IS-EVERYBODY-WANTS
2 METHODOLOGY. I JUST SEE THAT AS COMING FROM THE WRONG
3 DIRECTION. THAT IS NOT A NEW COMMENT FOR ME, BUT I THINK
4 THIS IS THE TIME TO SAY IT.

5 I'M GOING TO VOTE NO ON THIS BECAUSE I
6 THINK THAT'S THE BEST WAY TO GO. I THINK IN A SENSE IF
7 YOU BUY THAT ARGUMENT, AND IF YOU BELIEVE THERE'S A WAY
8 TO DO IT RIGHT, THEN WE'RE OVERDESIGNING THESE OTHER
9 PLANS. BUT THE FACT OF OVERDESIGNING BECOMES IRRELEVANT
10 BECAUSE WE ALL KNOW THAT THESE PLANS ARE NOT GOING TO BE
11 IMPLEMENTED FROM THOSE AGENCIES LARGELY OUTSIDE OF THE
12 CONTROL OF THIS BODY, THAT IS, THE MAJOR PORTIONS OF
13 THEM.

14 ACTING LIKE WE CAN DO A REGIONAL MOBILITY
15 PLAN THAT WE KNOW ISN'T GOING TO BE FUNDED EITHER AT THE
16 LEVEL OR IN THE TIME FRAME THAT THE PLAN SAYS, BUT THAT
17 SOMEHOW LEGITIMIZES THE LEVEL OF GROWTH THAT THE ORIGINAL
18 PLAN IS GOING TO ACCOMMODATE; THEREFORE, THE ACCOMODATION
19 THAT SHOULD TAKE PLACE JUSTIFIES THE GROWTH WE SHOULD BE
20 ACKNOWLEDGING CAN'T BE SUSTAINED. AND I THINK BEFORE WE
21 BACK OURSELVES INTO HODGEPODGE LIKE THAT, I'D LIKE TO
22 JUST RAISE A VERY STRONG OBJECTION AT THE FOUNDATIONAL
23 LEVEL.

24 CHAIRMAN GRIFFIN: BOB, DID YOU GET ALL YOUR
25 COMMENTS IN?



MR. WAGNER: I'D JUST LIKE TO MAKE A STATEMENT THAT YOU'VE MADE A NUMBER OF WHAT I CONSIDERED TO BE MISSTATEMENTS IN TERMS OF WHAT WAS INTENDED BY THIS PLAN. THERE DEFINITELY WAS NOT AN INTENT TO FOIST MAXIMUM NUMBERS ON ANYBODY. THE OBJECTIVE OF THE DEVELOPMENT OF THE PLAN WAS TO COME UP WITH THE BEST ESTIMATE OF WHAT THIS REGION IS GOING TO SEE IN THE FUTURE, AND THEN PLAN TO ACCOMODATE FOR THAT THROUGH THESE OTHER PLANS. AND ANYBODY THAT FELT THAT THE NUMBERS WERE BEING FOISTED ON THEM, CERTAINLY HAD COMPLETE OPPORTUNITIES TO COME IN AND PROVIDE RATIONALE AS TO WHY THEY DIDN'T THINK THEIR AREA COULD ACCOMODATE SOME OF THEM. AND, IN FACT, MANY OF THEM DID PROVIDE EXCELLENT RATIONALE FOR THAT. AND THE NUMBERS WERE ACCORDINGLY CHANGED IN THOSE AREAS.

LIKE I SAID BEFORE, I THINK IT CERTAINLY IS TRUE THAT WHAT WE HAVE IS UNDOUBTEDLY NOT A PERFECT DOCUMENT. BUT I CAN CERTAINLY ASSURE YOU THAT STAFF HAS, IN MY OPINION, DONE AN EXCELLENT TECHNICAL JOB OF ATTEMPTING TO DO THE JOB THAT WAS -- THAT WAS ASSIGNED TO THEM IN TERMS OF ESTIMATING WHAT KIND OF GROWTH THIS REGION CAN ANTICIPATE IN THE FUTURE. I THINK THEY HAVE MADE EVERY EFFORT TO TAKE INTO ACCOUNT A LOT OF DIFFERENT INFLUENCES ON THE REGION MUCH MORE EXTENSIVELY THAN HAS EVER BEEN DONE BY ANY AGENCY IN THE PAST IN TERMS OF PERFORMING THIS JOB. AND THESE NUMBERS ARE NOT WHAT YOU

WOULD CALL MAXIMUM NUMBERS AT ALL.

CHAIRMAN GRIFFIN: OKAY. CHRIS, AND THEN AFTER CHRIS IS TIM, CLARENCE, ELMER, AND THEN ARNIE.

MS. REED: I JUST HAD A QUESTION FOR THE STAFF. EVEN THOUGH WE'VE PUT THIS MOTION INTO THIS PARTICULAR PLAN ADOPTION ON A TIME EXTENSION, WOULDN'T IT BE STAFF'S POSITION THAT WE WOULD NEED TO PRESENT THE CASE TO THE DISTRICT AND ARGUE ASSERTIVELY THE NEED FOR THIS EXTENSION. OTHERWISE, IT'S NOT GOING TO HAPPEN. WE HAVE GOT TO GET IT INTO THE AIR PLAN, TOO, TO MAKE THIS ALL HAPPEN. THAT IS IT.

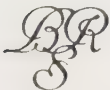
CHAIRMAN GRIFFIN: TIM.

MR. JOHNSON: IT'S BEEN SO LONG, I'M TRYING TO REMEMBER.

CHAIRMAN GRIFFIN: WE HAVE A MOTION THAT'S MADE.

MR. JOHNSON: YES. I'D LIKE TO CHANGE LARRY'S MIND.

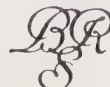
FROM MY COMMENTS SUPPLIED TO THE MOBILITY PLAN, THE GROWTH PLAN, THE AIR QUALITY MANAGEMENT PLAN, I DON'T THINK THERE IS A PLAN ON ANY OF THOSE THREE SUBJECTS THAT ADEQUATELY SPEAKS TO THE PROBLEM, THAT IS, POLITICAL SURVIVAL. AND IF YOU GO ON THAT PREMISE, THEN, I THINK THERE IS MERIT IN DOING SORT OF WHAT BOB WAGNER MENTIONED AS FAR AS BEGINNING. NOW, I'LL GIVE YOU SOME SPECIFIC EXAMPLES:



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1 AT THE PRESENT TIME THE NEGATIVE IMPACTS OF
2 THE PLANS ARE ALREADY OUT ON THE TABLE AS A POSSIBILITY.
3 AS AN EXAMPLE, I WAS WORKING WITH A MAJOR NEW EMPLOYER
4 WHO WANTED TO COME TO THE GREATER L.A. BASIN ABOUT A YEAR
5 AGO WITH 1,200 JOBS, HALF OF WHICH WERE ENGINEERS -- HIGH
6 DOLLAR STUFF. THEY ARE NOW IN A SUBURB OF PORTLAND FOR
7 THE SPECIFIC REASON OF THE DRAFT AIR QUALITY MANAGEMENT
8 PLAN AND THE DRAFT GROWTH MANAGEMENT PLAN.

9 IT WASN'T WHAT THE PLAN SAID; IT WAS THE
10 UNPREDICTABILITY OF THE POLITICAL ENVIRONMENT IN SOUTHERN
11 CALIFORNIA THAT DROVE IT ELSEWHERE. THE NEGATIVE IMPACTS
12 ARE ALREADY OUT THERE. BY ADOPTING THIS PLAN, I THINK WE
13 CAN BEGIN TO IMPROVE SOME OF THE POSITIVE IMPACTS.

14 ANOTHER QUICK ILLUSTRATION ON THAT: A GOOD
15 FRIEND OF MINE HAS ONE OF THE LARGEST TRUCKING FLEETS IN
16 THE REGION. HE WENT TO ORDER A NEW TRUCK YESTERDAY, AND
17 HE ASKED FOR SOMETHING THAT HAD A CLEANER ENGINE. HE WAS
18 WILLING TO PAY WHATEVER IT COST TO BUY THEM. HE WAS A
19 FAIRLY PROGRESSIVE CHAP. THERE WAS NOTHING AVAILABLE TO
20 HIM OFF THE SHELF WITHOUT DESIGNING HIS OWN.

21 IF WE BEGIN TO ADOPT SOME OF THESE PLANS
22 AND SEND THE MESSAGES TO INDUSTRY THAT THERE ARE GOING TO
23 BE STANDARDS WITH DEADLINES. WE'LL BEGIN TO CREATE
24 INCENTIVES FOR THE POSITIVE IMPACTS TO COME BACK TO US.

25 SO EVEN THOUGH I THINK ALL OF THEM HAVE

1 FLAWS, WHICH IS NO REFLECTION ON STAFF OR CONSULTANTS. I
2 THINK WE HAVE GOT TO START SOMEWHERE, AND THIS IS A PLACE
3 TO START.

4 CHAIRMAN GRIFFIN: ALL RIGHT. CLARENCE.

5 MR. SMITH: I JUST WANT TO SAY THAT THIS IS WHAT
6 HE SAID, THIS IS THE PLAN. IT'S NOT A PERFECT DOCUMENT,
7 AND IT CAN BE ADJUSTED AS WE GO ALONG THE WAY. AND I
8 THINK WE MUST BEGIN SOMEWHERE. I THINK STAFF HAS DONE A
9 TREMENDOUS JOB IN PUTTING ON PAPER AND PLANNING SOMEWHERE
10 WE SHOULD GO. AND OUR DELAYING THIS GROWTH MANAGEMENT
11 PLAN, I THINK, IS JUST -- WOULD NOT BE TO THE BENEFIT OF
12 THE REGION. SO I WOULD HATE TO EVEN ENTERTAIN THE
13 THOUGHT OF DELAYING THE PLAN. BUT I WANT YOU TO KNOW I
14 SUPPORT -- I THINK THAT WE, IN LONG BEACH, HAVE WORKED
15 WITH THIS COMMITTEE. WE JUST FINISHED OUR PLAN. ADOPTED
16 IT. AND WE'RE TRYING TO MATCH WHAT WE HAVE HERE AS A
17 REGION. I THINK THE REGIONS MUST WORK TOGETHER IN TRYING
18 TO PULL THESE DEPARTMENTS TOGETHER. SO I DON'T THINK
19 THAT WE SHOULD EVEN ENTERTAIN THE NOTION OF DELAYING THIS
20 PLAN, IT'S LATE AS IT IS.

21 CHAIRMAN GRIFFIN: ALL RIGHT. ELMER.

22 MR. DIGNEO: WELL, THESE TWO SAID WHAT I WAS,
23 BASICALLY, GOING TO SAY. IF WE KEEP THIS ON HOLD, WE
24 COULD GET REQUESTS AND REASONS WHY THERE OUGHT TO BE
25 DELAYS FOR 60 DAYS OR 6 MONTHS OR CLEAR UP UNTIL THE YEAR



1 2010. WE HAVE TO START SOMEWHERE. RECOGNIZING THAT SOME
2 OF THIS WILL NOT WORK. BUT THAT THERE WILL BE MANY THINGS
3 THAT WILL BE ADJUSTED AS WE GO ALONG. SO LET'S GET ON
4 WITH IT.

5 CHAIRMAN GRIFFIN: ARNIE.

6 MR. SHERWOOD: THIS PLAN IS NOT CALLING FOR FIVE
7 MILLION ADDITIONAL PEOPLE AND THREE MILLION ADDITIONAL
8 JOBS. THAT'S OUR BEST ESTIMATE OF WHAT IS GOING TO
9 OCCUR. AND THE GROWTH MANAGEMENT, THE AIR QUALITY PLAN,
10 THE MOBILITY PLAN ALL ARE ATTEMPTS AT MAKING THE
11 SITUATION BETTER THAN WHAT WE ARE GOING TO HAVE IF WE
12 DON'T DO THESE PLANS. SO I JUST WANT TO MAKE THAT
13 DISTINCTION. I THINK MR. WALKER HAS A POINT THAT THE
14 EXECUTIVE COMMITTEE HAS LOOKED AT BEFORE. MAYBE YOU WANT
15 TO REVISE THE PLAN AT SOME TIME, WHICH IS THE ISSUE OF
16 THE ADDITIONAL THINGS YOU MIGHT WANT TO LOOK AT. BUT AT
17 THIS TIME, WHAT THE GROWTH MANAGEMENT PLAN IS ATTEMPTING
18 TO DO IS MITIGATE THE IMPACT OF THE ADDITIONAL GROWTH
19 REGARDLESS OF WHAT WE WILL DO.

20 CHAIRMAN GRIFFIN: ANY FURTHER QUESTIONS?
21 COMMENTS?

22 ALL RIGHT. WE HAVE A MOTION TO WAIVE THE
23 WHOLE READING AND READ BY TITLE ONLY. ANY OBJECTIONS TO
24 THAT?

25 ALL RIGHT. COLIN.

1 MR. LENNARD: RESOLUTION 89-272-1. RESOLUTION
2 OF THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS FOR
3 THE ADOPTION OF THE 1988 REGIONAL GROWTH MANAGEMENT PLAN.

4 CHAIRMAN GRIFFIN: ALL RIGHT. MAY WE HAVE THE
5 ROLL CALL VOTE, PLEASE, MS. STEWART. YOU'LL HAVE TO
6 SPEAK A LITTLE LOUDER, PLEASE.

7 MS. STEWART: COUNCILWOMAN MOLINA

8 MS. MOLINA: AYE.

9 MS. STEWART: MAYOR BACHARACH.

10 REPORTER: WHAT WAS YOUR ANSWER? I'M SORRY.

11 MS. BACHARACH: I'M NOT VOTING.

12 MS. STEWART: SUPERVISOR WALKER.

13 MR. WALKER: NO.

14 MS. STEWART: COUNCILWOMAN SARTOR.

15 MS. SARTOR: YES.

16 MS. STEWART: COUNCILMAN TIM JOHNSON.

17 MR. JOHNSON: YES.

18 MS. STEWART: COUNCILMAN SMITH.

19 MR. SMITH: YES.

20 MS. STEWART: COUNCILMAN WAGNER.

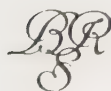
21 MR. WAGNER: YES.

22 MS. STEWART: SUPERVISOR MIKELS.

23 MR. MIKELS: YES.

24 MS. STEWART: COUNCILWOMAN REED.

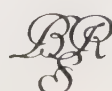
25 MS. REED: YES.



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1 MS. STEWART: PRESIDENT GRIFFIN.

2 CHAIRMAN GRIFFIN: YES.

3 THAT IS DONE. THAT CONCLUDES THE GMP
4 VOTES.

5 LET'S MOVE RIGHT ON TO THE RMP. IT'S A
6 SIMILAR PROCEDURE, AS I MENTIONED BEFORE. WE HAVE TWO
7 RECOMMENDED ACTIONS BY STAFF; HOWEVER, PLEASE NOTE THAT
8 WE'RE NOT GOING TO FOLLOW THE SAME SEQUENCE.

9 THE EIR IS FOUND ON PAGE 162, ELMER. THAT
10 RESOLUTION IN THE MAIN MOTION AS RECOMMENDED BY STAFF IS
11 FOUND ON PAGE 151. WHAT IS THE PLEASURE OF THE EXECUTIVE
12 COMMITTEE?

13 RMP -- ARE THERE ANY CLARIFICATIONS BY
14 STAFF BEFORE WE -- I'M GOING TO MAKE A COMMENT,
15 AND I THINK A COUPLE OF OTHERS WANT TO MAKE A COMMENT.
16 JIM.

17 MR. GOSNELL: WELL, WE'VE HAD A NUMBER OF
18 ISSUES, A NUMBER OF COMMENTS TODAY. A COUPLE THAT I'D
19 LIKE TO FOCUS ON IS FROM THE FIRST TWO SPEAKERS AND THE
20 ENERGY AND ENVIRONMENT COMMITTEE. THE SAN JOAQUIN HILLS
21 PROJECT DELETION PROPOSAL. THE STAFF HAS DONE A REVIEW
22 OF OUR PREVIOUS ANALYSIS.

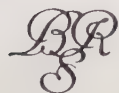
23 WE BELIEVE THAT THE SAN JOAQUIN HILLS
24 PROJECT SHOULD BE INCLUDED IN THE REGIONAL MOBILITY PLAN.
25 AS MR. BENNETT POINTED OUT, IT HAS BEEN IN PREVIOUS

1 REGIONAL TRANSPORTATIONAL PLANS. WE HAVE DONE A REVIEW
2 SINCE THURSDAY, AGAIN OF TRAFFIC IMPACTS OF THE CORRIDOR
3 WITH AND WITHOUT THE CORRIDOR IN THAT AREA. WE HAVE
4 DEVELOPED -- REVIEWED THE GROWTH PROJECTIONS, AND WE
5 BELIEVE THAT THE CORRIDOR IMPROVEMENT -- SIGNIFICANTLY
6 IMPROVES THE TRANSPORTATION SERVICE IN THE REGION OR IN
7 THAT AREA -- IN THE REGION IN GENERAL. SO WE WOULD
8 SUPPORT THE CONTINUED INCLUSION OF THE SAN JOAQUIN HILLS
9 CORRIDOR IN THE PLAN.

10 THE COMMENTS FROM VICA, I THINK, ARE
11 REFLECTIVE OF OTHER COMMENTS THAT WE'VE RECEIVED, AND WE
12 DON'T SEE ANY CHANGES TO RESPOND TO THOSE COMMENTS;
13 ALTHOUGH, WE WOULD LIKE TO TAKE VICA UP ON THEIR OFFER TO
14 WORK ON IMPLEMENTATION OF THIS.

15 THE RAC RECOMMENDATIONS THAT MR. GRAYSON
16 HANDED OUT, THE FIRST ONE. HE WAS CORRECT THAT THE
17 SYSTEM MANAGEMENT CHANGE HAS ALREADY BEEN MADE IN THE
18 MATERIALS THAT YOU HAVE IN FRONT OF YOU, SO WE ARE
19 SUPPORTIVE OF THAT.

20 RELATIVE TO THE SECOND RECOMMENDATION ABOUT
21 CAPITAL EXPENDITURES RECEIVING PRIORITY FOR JOB/HOUSING
22 BALANCE, WE HAVE POLICY STATEMENTS IN THE PLAN CURRENTLY
23 THAT SAYS THE CAPITAL INVESTMENTS OR TRANSPORTATION
24 INVESTMENTS WILL BE SUPPORTIVE OF -- OR SHALL BE
25 SUPPORTIVE OF THE GROWTH MANAGEMENT PLAN.



1 THE GROWTH MANAGEMENT PLAN TALKS ABOUT A SYSTEM
2 OF PRIORITIES BEING ESTABLISHED FOR INFRASTRUCTURE TO BE
3 COVERED. WE HAVE OTHER PRIORITY STATEMENTS IN THE PLAN
4 NOW, RELATIVE TO THE CONSTRAINED AND UNCONSTRAINED
5 PROGRAM GIVING PRIORITY TO THE CONSTRAINED PROGRAM.
6 WITHIN THE CONSTRAINED PROGRAM, WE HAVE NOT ESTABLISHED
7 SPECIFIC PRIORITIES AMONGST INDIVIDUAL PROJECTS.

8 I WOULD BE VERY SUPPORTIVE OF WHAT MR.
9 GRAYSON WAS SAYING IN HIS PRESENTATION ON HAVING PROJECT
0 PROPOSERS IDENTIFY THE IMPLICATIONS OF THE PROJECT ON
1 JOB/HOUSING BALANCE. SO THAT'S OUR RESPONSE TO COMMENTS
2 GENERATED.

3 CHAIRMAN GRIFFIN: I'D LIKE TO ASK JUDY WRIGHT,
4 IF YOU WOULD, SINCE YOU'RE THE CHAIRMAN, WOULD YOU LIKE
5 TO RECOMMEND A MOTION, BEING THE CHAIRMAN OF THE TCC?

6 MS. WRIGHT: FINE. AND I WOULD -- IS THIS
7 APPROPRIATE, SINCE I DON'T VOTE, TO MAKE A MOTION?

8 CHAIRMAN GRIFFIN: NO. YOU'LL RECOMMEND A
9 MOTION, AND WE WILL -- ONE OF THE MEMBERS OF TCC WILL
0 THEN CONSIDER THAT, AND THEN WE'LL HAVE DISCUSSION ON THE
1 MATTER.

2 MS. WRIGHT: I CERTAINLY WOULD RECOMMEND THE
3 MOTION AND THE RECOMMENDATION OF THE PLAN BEFORE YOU
4 INCLUDING THE RAC COMMENTS.

5 MR. GRAYSON AND JIM GOSNELL AND I GOT OUR

1 HEADS TOGETHER A FEW MINUTES AGO TO CHANGE THE WORDING OF
2 THE SECOND RECOMMENDATION ON THE JOB/HOUSING BALANCE TO
3 SAY, "IN THE ANALYSIS OF THE PROJECT TO MAKE MAJOR
4 EXPENDITURES SHOULD SHOW THAT THE PROJECT CONTRIBUTES
5 SIGNIFICANTLY TO THE ACHIEVEMENTS OF THE JOB/HOUSING
6 BALANCE GOALS," AND THAT -- THAT SHOULD BE INCLUDED IN
7 THE PLAN AS WELL AS THE FIRST RECOMMENDATION.

8 MR. WAGNER: POINT OF ORDER.

9 CHAIRMAN GRIFFIN: YES, BOB.

10 MR. WAGNER: WE'VE ALREADY ADDRESSED THE GROWTH
11 MANAGEMENT PLAN WHICH IS THE SECOND ITEM TALKED ABOUT.

12 MS. WRIGHT: THIS WOULD BE INCLUDED IN THE RMP.
13 THE WAY IT'S REWORDED, IT WOULD BE INCLUDED IN THE
14 REGIONAL MOBILITY PLAN.

15 CHAIRMAN GRIFFIN: MARK, WOULD LIKE TO JUST
16 RESPOND TO THAT.

17 MR. PISANO: COUNCILMAN WAGNER, MRS. WRIGHT. AS
18 I HEARD THE SUGGESTION, IT WOULD BE REFLECTED IN THE
19 REGIONAL MOBILITY PLAN CONCERNING THE EXPENDITURE OF
20 FUNDS. THAT, IN FACT, WOULD REFLECT THE POLICIES THAT
21 THE EXECUTIVE COMMISSION ADOPTED IN THE GROWTH MANAGEMENT
22 PLAN. IT CAN BE INTERPRETED AS ONE OF THE IMPLEMENTATION
23 STEPS IN THE GROWTH MANAGEMENT PLAN AS I CALL IT.

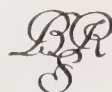
24 CHAIRMAN GRIFFIN: OKAY. FINE. WE HAVE HER
25 RECOMMENDATIONS AND CLARIFICATIONS.



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1 FIRST, IT IS THE EIR CONSIDERATION. WHAT
2 IS THE PLEASURE OF THE EXECUTIVE COMMITTEE?

3 MS. REED: I'LL MOVE THE CERTIFICATION OF THE
4 RESOLUTION CERTIFYING THE FINAL EIR PREPARED FOR THE 1988
5 REGIONAL MOBILITY PLAN, AND INCLUDE IN MY MOTION THE
6 WAIVER OF THE FULL READING OF THE RESOLUTION.

7 MR. SHERWOOD: SECONDED.

8 CHAIRMAN GRIFFIN: ALL RIGHT. DISCUSSION? ALL
9 RIGHT. ASK FOR ROLL CALL, PLEASE.

10 MS. STEWART: COUNCILWOMAN MOLINA.

11 MS. MOLINA: AYE.

12 MS. STEWART: COUNCILWOMAN SARTOR.

13 MS. SARTOR: YES.

14 MS. STEWART: COUNCILMAN TIM JOHNSON.

15 MR. JOHNSON: YES.

16 MS. STEWART: COUNCILWOMAN NIEBURGER.

17 MS. NIEBURGER: YES.

18 MS. STEWART: COUNCILMAN MELTON.

19 MR. MELTON: YES.

20 MS. STEWART: COUNCILMAN SMITH.

21 MR. SMITH: YES.

22 MS. STEWART: COUNCILMAN WAGNER.

23 MR. WAGNER: YES.

24 MS. STEWART: SUPERVISOR MIKELS.

25 MR. MIKELS: YES.

1 MS. STEWART: COUNCILWOMAN REED.

2 MS. REED: YES.

3 MS. STEWART: PRESIDENT GRIFFIN.

4 CHAIRMAN GRIFFIN: YES.

5 NEXT WE HAVE TO HAVE CONSIDERATION IN
6 REGARD TO THE OVERALL TIME. THE --

7 MR. WAGNER: I MOVE THE RESOLUTION -- WOULD YOU
8 RESTATE --

9 MS. WRIGHT: THAT TWO IMPLEMENTATION MEASURES BE
10 INCLUDED AS RECOMMENDATIONS FROM THE REGIONAL ADVISORY
11 COUNCIL:

12 THE FIRST ONE IS THE SYSTEM MANAGEMENT BE
13 GIVEN PRIORITY.

14 THE SECOND ONE IS NOT TO BE INCLUDED IN THE
15 GROWTH MANAGEMENT PLAN, BUT THE REGIONAL MOBILITY PLAN.

16 IN THE ANALYSIS OF THE PROJECT TO MAKE
17 CAPITAL EXPENDITURES, IT SHOULD SHOW THE PROJECT
18 CONTRIBUTING SIGNIFICANTLY TO THE ACHIEVEMENT OF THE
19 JOB/HOUSING BALANCE GOALS.

20 MR. MIKELS: I'LL TELL YOU, WITHOUT GOING INTO
21 THE MERITS OF THAT AMENDMENT, ONE OF THE THINGS THAT WE
22 ESTABLISHED WHEN THIS DISCUSSION BEGAN WAS THAT WE COULD
23 AMEND THIS PLAN IN PERTAINING TO THE DATE ON THE SYSTEMS
24 MANAGEMENT ISSUE WHICH (INAUDIBLE). I GUESS THAT'S
25 SIMPLY A STATEMENT OF -- WHAT I'M TRYING TO SAY -- TO



UNDERSTAND IS THAT AFTER THAT ANY OTHER MANDATORY CHANGES OR CAUSES ANY MANDATORY ACTIONS THAT HAVE NOT BEEN EVALUATED IN THE CONTENT OF THE PLAN ITSELF.

NOW, MY SUGGESTION IS TO NOT INCLUDE THE MOTION. SIMPLY PUT IT THERE AS AN AMENDMENT (INAUDIBLE). IF IT IS NOT SUBSTANTIVE AND SIMPLY DIRECTIONAL IN NATURE AND IT DOESN'T HAVE A SUBSTANTIVE IMPACT, WE DON'T HAVE A CHANCE TO ANALYZE THEM.

CHAIRMAN GRIFFIN: JIM, WILL YOU CLARIFY THAT?

MR. GOSNELL: THE WAY THAT MRS. WRIGHT IS PROPOSING THIS STATEMENT, I THINK, IS ALL RIGHT. IT'S SAYING THAT IN LOOKING AT INDIVIDUAL PROJECTS, THE PROJECT SPONSOR SHOULD BE EVALUATING THE JOB/HOUSING BALANCE, AND THAT THAT WILL BECOME A CRITERIA AND FACTOR IN OUR CONSIDERATION IN REVIEWING THE PROJECTS.

MS. REED: BUT HE'S ASKING A QUESTION ABOUT THE RAMP METER BUSINESS. IF YOU CHANGE TO 1993, DOES THAT MAKE IT MANDATORY FOR THE CITY -- OR CALTRANS -- OR IS IT JUST A STATEMENT YOU WANT THIS TO HAPPEN FASTER?

MR. GOSNELL: WELL, THAT'S IMPLYING THE SCHEDULE FOR CALTRANS. WE HAVE REVIEWED THAT WITH CALTRANS, AND I BELIEVE THAT IS A SATISFACTORY CHANGE IN THE PLAN, AND WE'VE ALREADY PROPOSED THAT WHAT IS IN FRONT OF YOU.

CHAIRMAN GRIFFIN: JUDY.

MS. WRIGHT: I THINK THAT -- THE RECOMMENDED

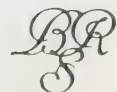
AMENDMENTS END WITH THE PERIOD AFTER PRIORITY. AND THAT THE REST OF THE STATEMENTS ARE A NARRATIVE ON THAT RECOMMENDATION. SO SYSTEM MANAGEMENT STRATEGIES CAN BEGIN WHEN THE GREATER PRIORITY IS ADDED TO THE PLAN, NOT THE DATE ADDED TO IT. DOESN'T THAT REFLECT THE -- NO?

MR. GRAYSON: SPECIFICALLY, OUR THOUGHT WAS THAT ON PAGE B-12 OF THE PLAN, WHERE THERE IS ONE ACTION ITEM THAT STATES THERE -- IN FACT, THERE ARE TWO -- BUT I BELIEVE THERE'S SOME CHANGE. IT SIMPLY STATES THAT THE PLAN IS TO IMPLEMENT RAMP METERS AND HOV BYPASS LANES THROUGHOUT THE SYSTEM BY THE YEAR 2010. AND YET ON THE OTHER HAND, THERE ARE OTHER ASPECTS OF THE SYSTEM MANAGEMENT WHICH ARE CALLED FOR TO BE IMPLEMENTED IN THE SHORT RANGE BY 1993.

OUR DISCUSSIONS WITH THE PEOPLE WHO ARE INVOLVED IN THE GENERAL PRIORITY OF FREEWAY SYSTEM MANAGEMENT ARE OF THE OPINION THAT THIS CAN BE IMPLEMENTED MORE QUICKLY. AND IN AN ERA OF SHORT FUNDS, WE SHOULD PUT A PRIORITY ON THOSE IMPROVEMENTS WHICH WILL MAKE THE SYSTEM WORK BETTER. SO THE PLAN -- ALL WE'RE ASKING IS THAT ONE NUMBER, WHICH NOW SAYS 2010, BE CHANGED TO 1993.

MR. MIKELS: THAT'S WHAT JUDY JUST SAID -- WELL, I'LL TELL YOU WHAT --

MR. GRAYSON: I DON'T UNDERSTAND WHAT THE HANG



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1 UP IS BECAUSE I UNDERSTOOD FROM JIM THAT IT'S ALREADY
2 BEEN DONE.

3 MR. MIKELS: LET ME TELL YOU ABOUT MY
4 PREFERENCES. THAT IS MY PROBLEM, NOT AN ESSENTIAL
5 PROBLEM. BUT ARE THERE REVERBERATIONS THROUGHOUT THE
6 PLAN IN TERMS OF TIMING OR COST THAT WE SIMPLY JUST DON'T
7 HAVE TIME TO CONSIDER? I WOULD SUGGEST THAT WE HAVE THIS
8 ISSUE ANALYZED AND HAVE THAT ANALYSIS THERE IN BLACK AND
9 WHITE RATHER THAN SPECULATING UPON IT AT THE TIME OF
0 ADOPTION. AND I WOULD RECOMMEND THAT WE SIMPLY APPROVE
1 THE RESOLUTION AND WAIVE FULL READING OF THE RESOLUTION
2 AT THIS TIME AND EXPLORE AND REFER THESE TWO ITEMS TO
3 STAFF FOR SUBCOMMITTEE ANALYSIS TO COME BACK AT THE NEXT
4 MEETING AT THAT DATE.

5 CHAIRMAN GRIFFIN: THERE'S A MOTION AND SECOND
6 ON THE FLOOR. I GUESS JIM'S STILL WAITING.

7 MR. GOSNELL: I'LL GO AHEAD AND TRY TO CLARIFY
8 IT FOR THE SUPERVISOR. WE HAVE DONE THAT. LOOK, I
9 FIGURE ACCORDING TO THE SECOND ACTION ON THE RAMP
0 METERING, WE HAVE BEEN IN DISCUSSION WITH CALTRANS. WE
1 DON'T BELIEVE THERE'S ANY NEGATIVE IMPLICATIONS OF MAKING
2 THIS ADJUSTMENT, SO WE CAN SUPPORT THAT AT THIS TIME.

3 CHAIRMAN GRIFFIN: ALL RIGHT. I WOULD JUST LIKE
4 TO MAKE A COMMENT WITH REGARD TO THE EEC ISSUE. AS OF
5 YESTERDAY AFTERNOON, AS I STARTED TO TELL YOU, BY THE

1 NUMBER OF PHONE CALLS FROM THE VARIOUS PEOPLE WITHIN THE
2 ORANGE COUNTY COMMUNITY, THE FELLOW COUNCILPEOPLE AND
3 SUPERVISORS, AS WELL AS THE PRIVATE SECTOR EXPRESSING
4 THEIR CONCERNS. I THINK IT'S BEEN ADDRESSED VERY WELL
5 HERE THAT THIS IS NOT THE TIME. IT WOULD BE AN
6 INAPPROPRIATE ACTION FOR US TO MODIFY ANYTHING WITH
7 REGARD TO THE SAN JOAQUIN. AND I THINK THE STATEMENTS
8 HAVE BEEN MADE. I FEEL THAT WE SHOULD STAY ON COURSE AND
9 NOT MAKE THOSE MODIFICATIONS.

10 FURTHER DISCUSSION ON THE RMP?

11 ALL RIGHT. THERE IS A MOTION ON THE FLOOR
12 TO WAIVE THE READING OF THE RESOLUTION, BUT TO JUST READ
13 THE RESOLUTION BY TITLE ONLY AND TO APPROVE THE RMP.
14 IT'S A RESOLUTION --

15 MR. MIKELS: ON THE SECOND PART, I REFER THESE
16 TWO ISSUES FOR ANALYSIS AS TO THEIR IMPACT ON THE PLAN
17 AND TO BE BROUGHT BACK AT THE -- EITHER AT THE MARCH 17TH
18 MEETING -- I DON'T KNOW, I DON'T KNOW WHAT THE
19 IMPLICATIONS OF THE ANALYSIS IS -- JIM SAID SOMETHING'S
20 BEEN DONE. I WANT TO SEE IT IN BLACK AND WHITE BEFORE I
21 VOTE ON IT.

22 MR. WAGNER: WHY DON'T WE JUST TAKE A VOTE ON
23 IT?

24 MR. MIKELS: WAIVE FURTHER READING OF THE
25 RESOLUTION -- APPROVE THE RESOLUTION.



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CHAIRMAN GRIFFIN: IS THAT ACCEPTABLE TO THE
SECOND?

MS. REED: ME. YEAH.

CHAIRMAN GRIFFIN: OKAY. SO NOW WE'RE CLEAR ON
WHAT THE MOTION IS. AND THAT'S TO ADDRESS THE
RESOLUTION.

GLORIA.

MS. MOLINA: THERE'S AN AMENDMENT THAT'S BEEN
PASSED OUT TO US THAT DEALS WITH REGARD TO THE USER FEES
IN THE TARGET POPULATION --

CHAIRMAN GRIFFIN: I'D LIKE TO RAISE A POINT OF
ORDER. I NEED SOME HELP HERE. THIS, WE RECEIVED AFTER
THE CLOSE OF THE PUBLIC HEARING. AND IN ALL DUE RESPECT
TO THE INDIVIDUAL WHO HAS, AT LEAST, BEEN KIND ENOUGH TO
LET US KNOW WHAT HE'S THINKING AND MADE COPIES FOR THAT
PURPOSE, I THINK WE HAVE TO CONDUCT THIS IN AN ORDERLY
FASHION, AND I WOULD LIKE TO -- AND I NEED SOME HELP FROM
OUR COUNSEL -- HOW DO WE DEAL WITH THIS? BECAUSE I THINK
THAT THIS CAN BE DEALT WITH.

MR. LENNARD: ALL WE DID WAS PASS THIS OUT FOR
YOUR INFORMATION. THESE ARE COMMENTS RECEIVED AFTER THE
DEADLINE. THESE ARE JUST FOR YOUR INFORMATION.

CHAIRMAN GRIFFIN: WE ARE REFERING THIS TO STAFF
FOR REVIEW.

MS. MOLINA: MY QUESTION IS DIFFERENT BECAUSE I

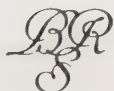
COULD ALWAYS MAKE MY MOTION TO PUT IT ON THE TABLE TO
DISCUSS -- MY ONLY CONCERN WITH REGARD -- IS THAT WE'RE
NOT GETTING INTO THIS KIND OF TECHNICALITY. I'M
CONCERNED -- I MEAN -- I MAKE CERTAIN ASSUMPTIONS THAT
ALL OF THESE PLANS ARE GOING TO BE -- THERE HAS TO BE
FLEXIBILITY IN WHAT WE'RE DOING. AND, CERTAINLY, WHEN WE
START TALKING ABOUT THE REGIONAL MOBILITY PLAN -- WE TALK
ABOUT ALL THE WAYS TO FUND THE KIND OF IMPROVMENT THAT WE
NEED -- I MEAN, I'M NOT SURE I WANT TO SUPPORT ONE OR THE
ANY OF THEM.

BUT IN THE FRAMEWORK FROM WHICH TO START
DISCUSSING HOW WE BEGIN FUNDING THESE PROPOSALS TO
CONSEQUENTLY BLEND WITH THE REVISIONS OF THESE TYPES, ARE
TO ME A NECESSITY -- SEEM TO BE AN ASSUMPTION THAT COULD
BE PUT IN THERE. I NOTICE IT'S NOT PREFACED ITSELF, BUT
THAT'S MY QUESTION TO WHOM EVER CAN EXPLAIN IT.

I DON'T KNOW THAT WE HAVE TO -- MINE IS AN
ASSUMPTION, I GUESS, THAT IN ALL OF THESE PLANS AS WE
START DEVELOPING THEM, THERE IS GOING DO BE A REAL
CONSIDERATION OF THE DIVERSITY OF POPULATION THAT WE'RE
GOING TO BE DEALING WITH EACH TIME, AND THE PROBLEMS AS
WE IMPLEMENT ANY OF THEM --

MR. GOSNELL: RIGHT.

MS. MOLINA: -- OTHERWISE, WE DO A SOCIOECONOMIC
IMPACT REPORT ON EVERY SINGLE STEP THAT WE TAKE. AM I



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1 INCORRECT IN THAT ASSUMPTION? IS THAT NOT THERE, THAT
2 ALL OF THESE THINGS WOULD BE DISCUSSED?

3 MR. GOSNELL: YOU ARE REFERRING TO THE HANDOUT?

4 MS. MOLINA: YES.

5 MS. REED: THIS IS A LEVEL OF DETAIL THAT
6 DOESN'T REALLY NEED TO BE PLANNED AT THIS STAGE.

7 CHAIRMAN GRIFFIN: ALL RIGHT. ARE YOU
8 SATISFIED?

9 MS. MOLINA: YOUR ANSWER WAS YES?

0 MR. GOSNELL: YES.

1 CHAIRMAN GRIFFIN: HIS ANSWER WAS YES.

2 ANYTHING FURTHER? ALL RIGHT. FURTHER
3 COMMENTS OR DISCUSSION?

4 MAY I ASK THE ATTORNEY TO PLEASE READ THE
5 RESOLUTION BY TITLE ONLY.

6 MR. LENNARD: YES, MR. PRESIDENT.

7 RESOLUTION 89-272-7, RESOLUTION OF THE
8 SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS, ADOPTION
9 OF THE 1988 REGIONAL TRANSPORTATION PLAN. AND THERE ARE
0 TWO MINOR AMENDMENTS IN THE FOURTH CLAUSE ON PAGE 151.
1 WHERE THE WORD SAYS "EXECUTIVE," IT SHOULD READ REGIONAL.
2 AND WHERE IT SAYS "CONSISTENT," IT SHOULD READ CONFORM.

3 CHAIRMAN GRIFFIN: ROLL CALL, PLEASE.

4 MS. STEWART: COUNCILWOMAN MOLINA.

5 MS. MOLINA: AYE.

1 MS. STEWART: SUPERVISOR WALKER.

2 MR. WALKER: YES.

3 MS. STEWART: COUNCILWOMAN SARTOR.

4 MS. SARTOR: YES.

5 MS. STEWART: COUNCILMAN JOHNSON.

6 MR. JOHNSON: AYE.

7 MS. STEWART: COUNCILWOMAN NIEBURGER.

8 MS. NIEBURGER: YES.

9 MS. STEWART: COUNCILMAN MELTON.

10 MR. MELTON: YES.

11 MS. STEWART: COUNCILMAN SMITH.

12 MR. SMITH: YES.

13 MS. STEWART: COUNCILMAN WAGNER.

14 MR. WAGNER: YES.

15 MS. STEWART: SUPERVISOR MIKELS.

16 MR. MIKELS: YES.

17 MS. STEWART: COUNCILWOMAN REED.

18 MS. REED: YES.

19 MS. STEWART: PRESIDENT GRIFFIN.

20 CHAIRMAN GRIFFIN: YES.

21 ALL RIGHT. MOTION TO READ BY TITLE ONLY?

22 MR. LENNARD: YES. PAGE 168.

23 CHAIRMAN GRIFFIN: SECOND? ANY OBJECTIONS TO
24 READ BY TITLE ONLY? ALL RIGHT.

25 MR. MIKELS: I MOVE --



CHAIRMAN GRIFFIN: ALL RIGHT. DISCUSSION?

MR. LENNARD. READ BY TITLE ONLY.

MR. LENNARD: RESOLUTION 89-272-4, RESOLUTION OF
THE ASSOCIATION OF GOVERNMENTS ON THE FINDING AND
CONSISTENCY BETWEEN THE '88 REGIONAL MOBILITY PLAN,
PLANNING AND PROGRAMMING EFFORTS.

CHAIRMAN GRIFFIN: ROLL CALL, PLEASE.

MS. STEWART: COUNCILWOMAN MOLINA.

MS. MOLINA: AYE.

MS. STEWART: SUPERVISOR WALKER.

MR. WALKER: YES.

MS. STEWART: COUNCILWOMAN SARTOR.

MS. SARTOR: YES.

MS. STEWART: COUNCILMAN JOHNSON.

MR. JOHNSON: AYE.

MS. STEWART: COUNCILWOMAN NIEBURGER.

MS. NIEBURGER: AYE.

MS. STEWART: COUNCILMAN MELTON.

MR. MELTON: YES.

MS. STEWART: COUNCILMAN SMITH.

MR. SMITH: AYE.

MS. STEWART: COUNCILMAN WAGNER.

MR. WAGNER: YES.

MS. STEWART: SUPERVISOR MIKELS.

MR. MIKELS: YES.

MS. STEWART: COUNCILWOMAN REED.

MS. REED: YES.

MS. STEWART: PRESIDENT GRIFFIN.

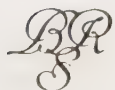
CHAIRMAN GRIFFIN: YES.

ALL RIGHT. THANK YOU.

I'D LIKE TO, AT THIS TIME, EXPRESS MY
APPRECIATION TO STAFF FOR A TREMENDOUS JOB AND A LOT OF
ASSISTANCE. AND I'D LIKE JUST TO MAKE A VERY BRIEF
COMMENT ABOUT WHAT HAS HAPPENED TO US FOR AN EXTENDED
PERIOD OF TIME.

I DON'T KNOW WHETHER -- IF IT IS -- IT'S
BEEN A STRUGGLE AND QUITE AN EFFORT OVER RECENT MONTHS
FOR ME TO DEAL WITH THE ISSUES THAT HAVE BEEN ON THE
TABLE. BUT I WANT ALL OF YOU FOLKS TO KNOW THAT I JUST
REALLY APPRECIATE THE COURTESY AND COOPERATION THAT
YOU'VE GIVEN ME, BOTH THE EXECUTIVE COMMITTEE, OUR STAFF,
OTHER ELECTED OFFICIALS THROUGHOUT REGION, AND THE
PRIVATE SECTOR AS WELL BECAUSE THIS IS REALLY, I THINK, A
FOUNDATION FOR US TO CONTINUE TO DO THE IMPORTANT WORK OF
THIS REGION. AND I REALLY THINK THAT I HAVE SEEN A
TREMENDOUS MOVEMENT OF -- FOR COOPERATION IN DEALING WITH
SUBSTANTIVE ISSUES THAT WILL ULTIMATELY LEAD TO THE
SOLUTIONS OF PROBLEMS THAT WE HAVE IN THIS REGION.

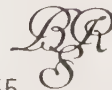
AND THE WAY, I THINK, THAT THIS EFFORT HAS
COME ABOUT -- I KNOW IT'S HARD WORK. THERE'S BEEN



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1 FRUSTRATIONS. THERE IS STILL A LOT OF WORK THAT NEEDS TO
2 BE DONE. BUT I THINK IT'S PEOPLE DEALING -- WORKING
3 TOGETHER THAT WILL BRING ABOUT THE SOLUTIONS. AND I WISH
4 TO THANK ALL OF YOU FOR YOUR ASSISTANCE.

5 JOHN MELTON.

6 MR. MELTON: MR. PRESIDENT, I'D LIKE TO THANK
7 YOU FOR THE JOB THAT YOU'VE DONE THROUGHOUT THE WHOLE
8 ORDEAL. I DON'T THINK A PRESIDENT FOR MANY, MANY YEARS
9 HAS HAD TO WORK AS HARD AS YOU HAVE.

0 MR. DIGNEO: WELL-STATED.

1 (END OF PROCEEDINGS.)

2 1:00 P.M.

REPORTER'S CERTIFICATE

I, Shannon M. Ross, HEREBY CERTIFY THAT ON THE
2nd DAY OF February, 1989, I DID REPORT IN
SHORTHAND THE TESTIMONY OF THE FOREGOING PROCEEDINGS;

THAT AT THE CONCLUSION OF THE ABOVE ENTITLED MATTER, I
DID TRANSCRIBE MY SHORTHAND NOTES INTO TYPEWRITING, AND THAT
THE FOREGOING TRANSCRIPT IS A TRUE AND CORRECT RECORD OF MY
SHORTHAND NOTES THEREOF.

Shannon M. Ross

SHORTHAND REPORTER



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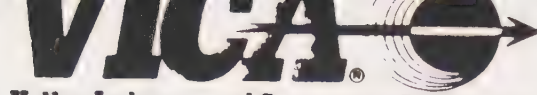


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COPIES OF LETTERS SUBMITTED TO THE EXECUTIVE COMMITTEE
DURING ITS PUBLIC HEARING ON FEBRUARY 2, 1989
AS RELATED TO
THE AIR QUALITY MANAGEMENT PLAN,
THE GROWTH MANAGEMENT PLAN,
THE REGIONAL MOBILITY PLAN, AND
THEIR RESPECTIVE ENVIRONMENTAL IMPACT REPORTS



Valley Industry and Commerce Association

VICA POSITION PAPER

January 31, 1989

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RICK WINSMAN

*PAST PRESIDENTS

VICA has reviewed the AQMP, the Regional Mobility Plan, and the Growth Management Plan as proposed for adoption in March.

We have considerable concern regarding the likelihood of these plans working in concert with each other because of several realities which we believe need to be addressed.

Our specific concerns are: the need for job/housing balance to be achieved in a synergistic manner; for development of sources of revenue to meet the multi-billion dollar shortfall presently existing between known revenues and those required for implementation of the plan; and priorities seem to be biased in favor of the very costly Rapid Transit infra-structure projects rather than directed toward projects of much less cost which can produce immediate benefits.

Reviewing the transportation demand management goals of the plan, VICA

- 1) questions feasibility of eliminating 3 million daily work trips through work at home and telecommuting as being unrealistically high;
- 2) believes that the increase in ride-sharing to 1,610,000 daily work trips will not occur unless incentives are established such as high occupancy vehicle lanes and ramps, increased cost for commuting through entrance/exit charges to freeways, or parking charges; 3) increased transit usage to 1.4 million daily work trips seems unrealistic in the near term due to the lack of infra-structure and the long-term

construction necessary to provide the infra-structure.

VICA is, however, prepared to support these plans and their goals, as well as the means for achieving them provided elected government officials are willing to bite-the-bullet and make the necessary legislative changes required to accomplish these goals and funding.

Specifically, VICA supports the creation of:

1. High occupancy vehicle lanes on all major freeway routes. High occupancy bypass entrance ramps at all freeway entrances. The implementation, region-wide, for all SCAG counties of the highly successful City of Los Angeles ADSAC system.
2. Legislative reforms to enable job/housing balance to be mandated through the planning process, the issuance of building permits, or through other means to achieve a truly synergistic job/housing balance.

For example, what VICA does not consider as job/housing balance is the project envisioned in the North San Fernando Valley in the Porter Ranch area which purports to offer in the vicinity of 7,700,000 square feet retail, office, hotel and entertainment space creating jobs that are mostly non-synergistic with the proposed 3,000 houses. Thus instead of being in balance the plan will likely create the need for

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thousands of extra person trips. It is imperative that in all regions to be developed in the future that the developers be required to provide adequate housing for the jobs being produced or conversely, adequate jobs for the housing being produced.

3. Developing funding sources for the implementation of the plans. This must be a proactive activity by the legislators and other government officials if it is to succeed. Some specific examples would be regional gas taxes, limited to the five county SCAG region in amounts up to as much as \$.30 per gallon, if necessary. Development taxes on new developments to provide appropriate revenue to build infra-structure. Freeway access charges which may be charged to the user automatically without delaying or causing traffic congestion (such as recently tested RF toll collecting projects).

4. System management and demand management activities designed to encourage shifting of hours of employment off of present peak periods to either earlier start times or later start times.

For example, tradeoffs for high truck traffic generating businesses to establish alternate means of doing their truck delivery and receipt function so that much of this traffic can be eliminated during peak periods. In this context, the

effort underway by the Teamsters with the City of L.A. regarding the construction industry is an excellent example of a positive proposal that will help eliminate congestion during peak periods by shifting approximately 100,000 trips from these periods to earlier time periods.

In summary, VICA stands ready to act as a participant in providing meaningful negotiations with large San Fernando Valley industry traffic generators to identify and implement congestion reduction changes in their operation. VICA also stands ready to assist in public education and pro-actively creating an understanding for the need for additional revenues to pay for the required infra-structure to implement the mobility plan, and for the tough adherence to synergetic job/housing balance in all future SCAG region development.

STAFF REPORT

February 2, 1989

DATE: February 2, 1989

TO: EXECUTIVE COMMITTEE

FROM: Paul Hatanaka
Environmental Planning Department

SUBJECT: Additional Comments on the Growth Management Plan
Draft Environmental Impact Report

TO: Don Griffin, SCAG President and
SCAG Executive Committee Members

FROM: David D. Grayson, Chairman
Regional Advisory Council

SUBJECT: Draft Regional Mobility Plan

Regional Advisory Council recommends two additional revisions to the plan:

o System Management - System management strategies can be given a greater priority. The Action Plan (p. V-12) presently states "implement remaining ramp meters and HOV bypass lanes by 2010." We urge this be completed by 1993.

o Job/Housing Balance - The Growth Management Program (p. V-3) clearly notes the importance of coordinating infrastructure plans and the benefits of directing the distribution of growth. We believe this goal can be achieved and the plan strengthened by adding the following:

In the analysis
"Capital expenditures which can be shown to contribute significantly to achievement of job/housing balance goals (i.e. reduce commute distance) should be given high priority."

On December 15, 1988, SCAG's Executive Committee postponed certifying the Draft Environmental Impact Report (EIR) for the Growth Management Plan and extended the public comment period to January 31, 1989.

An administrative Final EIR was prepared in mid January to ensure that the Executive Committee would have sufficient time to consider public comments prior to the February 2nd meeting. Comment letters received after mid January were incorporated into this staff report to be presented to the Executive Committee on February 2nd with the corresponding responses. Should the Committee choose to certify the Final GMP EIR, this staff report would become part of the Final EIR as well.

To date, only two comment letters dated January 23 and 25, 1989 were received on the Draft GMP EIR from a private citizen (Jesse A. Moorman). Copies of those letters with the responses to the comments are attached to this staff report. No new significant issues were presented that had not already been brought up previously and addressed.

SCAG's Energy and Environmental Committee met on January 26, 1989 and discussed the Draft/Final EIR on the Growth Management Plan. That committee raised no new issues and recommended that the Executive Committee certify the Final EIR.

In light of these comments received during the extension of the public comment period, it is respectfully recommended that the Executive Committee certify the Final GMP EIR.

RESPONSES TO THE COMMENTS OF JESSE A. MOORMAN
(1/23/89)

JAN 26 1989
Jesse A. Moorman
2511 W. 5th Street
Los Angeles, CA 90057
January 23, 1988

RE: COMMENT on Draft EIR's for Regional
Growth Management, Transportation & Air Quality Plans

Southern California Association of Governments
600 S. Commonwealth Avenue, Suite 1000
Los Angeles, CA 90005

Attention: Paul H Hatanaka, Principal Planner

To Whom it may concern:

The Growth Management Plan, Regional Mobility Plan and Air Quality plan are premised upon continued vigorous growth in Southern California. Growth is said to be market driven and is treated as if its rate is beyond significant control.

I believe that the basic assumptions of the planning process are controlled by rather narrow financial and political interests, which do not serve the health, safety and welfare of the citizens of Southern California. The continued degradation of our quality of life is presupposed, and reasonable alternatives with much better environmental consequences are not even studied for comparison.

Many citizens groups have expressed their serious concern with intolerable traffic congestion, smog and other problems that will certainly grow worse under your plans, yet there is no accommodation for their legitimate concerns. The people of Southern California are being sold out for the benefit of politicians and real estate speculators. Your EIR's do not justify the further destruction of our environment.

Sincerely,


Jesse A. Moorman

- A. Growth is not only market driven, but is to a large extent internally generated (e.g., births). Also, growth is not "treated as if its rate is beyond significant control." The Growth Management Plan outlines regional goals, strategies for attaining them, and implementation measures. Today we are faced with overcrowding, congestion, and degradation of the natural environment. The solution to the negative impacts of today's growth and future growth is to guide the timing and distribution of development within the region as presented in the Growth Management Plan.
- B. The basic assumptions used in the planning process for the Growth Management Plan were not controlled by narrow financial and political issues. Instead, the Plan is an option to the region which integrates a variety of techniques to attain a desired regional growth pattern without resorting to exclusionary measures and excessive constraints. A wide array of technical, political, environmental, and financial indicators were used in this planning process. In fact, this process continues to be dynamic with a recent workshop held on the Air Quality Management Plan, the Growth Management Plan, and the Regional Mobility Plan as related to the socioeconomic impacts of these plans to the region (January 31, 1989--jointly sponsored by SCAG and SCAQMD). The planning process will continue to fine tune the plan even after adoption has occurred.
- C. Seven reasonable alternatives were considered in the plan and in the accompanying Draft EIR. The environmental consequences from the alternatives were assessed in the Draft EIR as stipulated under the State CEQA Guidelines. In addition, contingencies have been added in the appendices to the plan itself (GMP, Appendix 6--October 1988).
- D. The public has been brought into the planning process through numerous public workshops and hearings and through the extension of the public review comment period. Over 700 copies of the draft environmental impact report were distributed to various agencies and private citizens for their input. Also, the plan is itself a mitigation to the projected growth, thereby lessening and not worsening the environmental problems of traffic congestion, smog, etc.
- E. The purpose of an environmental impact report is not to justify the further destruction of the environment. The draft GMP EIR was prepared to inform the public and to aid decision makers in identifying the environmental impacts associated with the proposed plan and what mitigation measures would be appropriate to reduce the impacts. This EIR/planning process and the new legislation passed (AB 3180-Cortese ---to monitor EIR mitigation measures) has undergone much public scrutiny and involvement to ensure that legitimate environmental concerns have been addressed and mitigated, to the extent possible.

ENCLOSURE

JAN 31 1989

SOUTHERN CALIFORNIA ASSN
OF GOVERNMENTS

Jesse A. Moorman
2511 W 5th Street
Los Angeles, CA 90057
January 25, 1989

Southern California Association of Governments
600 S. Commonwealth Ave, Suite 1000
Los Angeles, CA 90005

RE: 1988 GROWTH MANAGEMENT PLAN — WATER SUPPLIES.

TO WHOM IT MAY CONCERN:

The Draft EIR discusses water supply inadequately. Page 6-1 notes that 64 percent of SCAG region's water is imported, that the supplies of imported water are uncertain and are expected to decrease. Yet page 6-9 assumes that future water demand will increase proportionally with population and that Los Angeles Aqueduct supplies remain stable.

The EIR must consider the environmental effects of greater shortages of water if L.A. Aqueduct flows less freely, and the effects upon Owens Basin and Mono Basin if the Aqueduct flows unabated.

I visited both Owens Basin and Mono Lake yesterday. The effects of the L.A. Aqueduct upon Mono Lake are dramatically visible. There exists a great volume of pertinent information the environmental effects of the L.A. Aqueduct. This Growth Management Plan is the one place where consideration of that information is most necessary, because it is the keystone to unrestrained population growth in Southern California. Please correct this defect.

Sincerely,
Jesse A. Moorman

RESPONSES TO THE COMMENTS OF JESSE A. MOORMAN
(1/25/89)

F. In assessing the plan impacts associated with water supply, several consultations were made with the Metropolitan Water District. That agency is the major water purveyor for the SCAG region and has been extensively involved with following water supply issues for the entire California area (outside of the SCAG region). Consequently, unless newer information is made available to SCAG, we believe that 64% of SCAG region's water supply are imported and that supplies of imported water are uncertain as stated on Page 6-1 of the Draft EIR. On Page 6-2, the report further states that the Los Angeles Aqueduct provides 80% of the water supply for the City of Los Angeles. However, pending or future litigation and legislation could lessen this yield substantially. This states the existing situation as we know it. It is nearly impossible at this time to predict how issues dealing with the Mono Basin and Owens Valley will be resolved by the year 2010. As such, the State CEQA Guidelines specify that reasonable and not highly speculative analysis be done in assessing environmental impacts.

Given the CEQA Guidelines then, for Page 6-9 of the Draft EIR, we do recognize that there will be a regional water supply shortfall of 1.2 million acre-feet by the year 2010. But the assumptions are made that the Los Angeles Aqueduct supplies will remain stable, with water conservation measures implementation effective in reducing urban consumption rates by 5%, and no new additional yields will be made available to the region. These are conservative assumptions, considering the many unknown variables we are dealing with in identifying water supply demands for the future. We have also had input from the Metropolitan Water District which has the expertise in this area. Therefore, we believe that the analysis is reasonable and that the water supply analysis in the draft EIR is adequate under the State CEQA Guidelines.

F.

G.

G. Given the discussion of the Los Angeles Aqueduct on Pages 6-2, 6-9, and 6-10 of the Draft GMP EIR and the previous response item (Response F), the environmental effects of the Los Angeles Aqueduct, Mono Basin, and Owens Basin have been adequately addressed at a regional environmental analysis following State CEQA Guidelines.

H.

H. The Growth Management Plan is not "... a keystone to unrestrained population growth in Southern California." It is an option for how the region can guide development and achieve regional goals, including meeting water supply needs, attaining mobility goals, and dealing with wastewater treatment processes which are all major infrastructure issues relating to growth.

STAFF REPORT

DATE: February 2, 1989

TO: EXECUTIVE COMMITTEE

FROM: Paul Hatanaka
Environmental Planning Department

SUBJECT: Additional Comments on the Regional Mobility Plan
Draft Environmental Impact Report

Jesse A. Moorman
2511 W. 5th Street
Los Angeles, CA 90057
January 23, 1988

On December 15, 1988, SCAG's Executive Committee postponed certifying the Draft Environmental Impact Report (EIR) for the Regional Mobility Plan and extended the public comment period to January 31, 1989.

An administrative Final EIR was prepared in mid January to ensure that the Executive Committee would have sufficient time to consider public comments prior to the February 2nd meeting. Comment letters received after mid January were incorporated into this staff report to be presented to the Executive Committee on February 2nd with the corresponding responses. Should the Committee choose to certify the Final RMP EIR, this staff report would become part of the Final EIR as well.

To date, only one comment letter dated January 23, 1989 was received on the Draft RMP EIR from a private citizen (Jesse A. Moorman). A copy of that letter with the responses to the comments is attached to this staff report. No new significant issues were presented that had not already been brought up previously and addressed.

SCAG's Energy and Environmental Committee met on January 26, 1989 and discussed the Draft/Final EIR on the Regional Mobility Plan. That committee raised one issue concerning the San Joaquin Transportation Corridor and recommended that the Executive Committee postpone adopting the Final RMP. Member Chris Reed (Santa Monica) moved to delete the San Joaquin Corridor from the RMP and requested that the Executive Committee hold off on the adoption of the plan until SCAG staff further studied the impacts of the corridor and determined what the deletion of the corridor would do to the Plan. Staff would then present information to the Energy and Environment Committee at its next meeting. The environmental issues of this corridor have been addressed in the Draft RMP EIR and do not necessitate a response.

In addition, Mr. Brian Allen (private citizen) attending the Energy and Environmental Committee meeting on January 26th, was concerned that his comments submitted earlier to SCAG had not been responded. A response to this comment can be found in this staff report.

Given that no new significant issues were raised during the extension of the public comment period, it is respectfully recommended that the Executive Committee certify the Final RMP EIR.

RE: COMMENT on Draft EIR's for Regional
Growth Management, Transportation & Air Quality Plans

Southern California Association of Governments
600 S. Commonwealth Avenue, Suite 1000
Los Angeles, CA 90005

Attention: Paul H Hatanaka, Principal Planner

To Whom it may concern:

- A. The Growth Management Plan, Regional Mobility Plan and Air Quality plan are premised upon continued vigorous growth in Southern California. Growth is said to be market driven and is treated as if its rate is beyond significant control.
- B. I believe that the basic assumptions of the planning process are controlled by rather narrow financial and political interests, which do not serve the health, safety and welfare of the citizens of Southern California. The continued degradation of our quality of life is presupposed, and reasonable alternatives with much better environmental consequences are not even studied for comparison.
- C. Many citizens groups have expressed their serious concern with intolerable traffic congestion, smog and other problems that will certainly grow worse under your plans, yet there is no accommodation for their legitimate concerns. The people of Southern California are being sold out for the benefit of politicians and real estate speculators. Your EIR's do not justify the further destruction of our environment.
- D.
- E.

Sincerely,


Jesse A. Moorman

RESPONSES TO THE COMMENTS OF JESSE A. MOORMAN
(1/23/89)

- A. Growth is not only market driven, but is to a large extent internally generated (e.g., births). Also, growth is not "treated as if its rate is beyond significant control." In a separate document (Growth Management Plan), SCAG outlines regional goals, strategies for attaining them, and implementation measures. Today we are faced with overcrowding, congestion, and degradation of the natural environment. The solution to the negative impacts of today's growth and future growth is to guide the timing and distribution of development (including transportation needs) within the region as presented in the Regional Mobility Plan.
- B. The Regional Mobility Plan provides a flexible framework for the discussion and resolution of transportation issues expected to confront the SCAG region during the next 20 years. Through a deliberate process of periodic technical review and analysis, monitoring, and public debate, selective efforts shall be undertaken to ensure that this document adapts to the changes occurring in the region.
- C. Five reasonable alternatives were considered in the plan and in the accompanying Draft EIR. The environmental consequences from the alternatives were assessed in the Draft EIR as stipulated under the State CEQA Guidelines.
- D. The public has been brought into the planning process through numerous public workshops and hearings and through the extension of the public review comment period. Over 700 copies of the draft environmental impact report were distributed to various agencies and private citizens for their input. In addition, the Plan is itself a mitigation to the consequences of growth and mobility problems.
- E. The purpose of an environmental impact report is not to justify the further destruction of the environment. The draft RMP EIR was prepared to inform the public and to aid decision makers in identifying the environmental impacts associated with the proposed plan and what mitigation measures would be appropriate to reduce the impacts. This EIR/planning process and the new legislation passed (AB 3180-Cortese ---to monitor EIR mitigation measures) has undergone much public scrutiny and involvement to ensure that legitimate environmental concerns have been addressed and mitigated, to the extent possible.

RESPONSES TO THE COMMENTS OF BRYAN ALLEN
(1/26/89)

Mr. Allen has made several policy comments on the draft RMP. Items related to the RMP EIR can be found in the Final RMP EIR on Pages C-75, C-82, and C-83.

In regards to various editorial and selected nonpolicy related suggestions for changes to the RMP, staff is still reviewing Mr. Allen's comments. Upon plan adoption, staff will prepare the document for final reproduction. At that time, selected editorial, grammatical, and other overall production related preparations will be made. All comments and suggestions received during the public comment period will be considered for inclusion in the plan during this process.



SIERRA CLUB — ANGELES CHAPTER

3550 WEST SIXTH STREET, SUITE 321, LOS ANGELES, CALIFORNIA 90020
(213) 387-4287

Please reply to 900 West Harrison Avenue, Claremont CA 91711

25 January 1989

Southern California Association of Governments
600 South Commonwealth Avenue - Suite 1000
Los Angeles, California 90005

Ladies and Gentlemen:

In view of the changes proposed for the Draft Growth Management Plan, made before our letter of 12 December 1988 reached you, this Subcommittee of the Chapter has some further comments. We hope your next draft will take both sets into account.

We reiterate and expand on some of our earlier general comments because they were not obviated by the changes. Open Space should be given more importance in the Plan text rather than just relying on the list of mitigations suggested by the E.I.R. Along with preservation of park lands and expansion where needed, there should be statements that existing park lands should not be invaded by non-park or "semi-park" uses or sold off; and new parks for the urbanizing areas should either be acquired in fee or protected by easement contracts and proper zoning (perhaps all three may be needed).

Review of progress in improving the job/housing balance should not only be monitored yearly (as the new language requires) but evaluated in terms of achieving the goals. When and where progress does not appear after a year, SCAG should prepare, right away, to undertake stronger enforcement measures, not after the 5-year review. This region can not afford to wait that long for effective action.

Below we comment on more specific changes observed.

Addendum Draft GMP Changes (attachment 5C-2): We are pleased to see a larger and more detailed map replacing the one on p. VI-7, thus meeting one of our suggestions. We hope other suggested maps will be forthcoming.

Draft GMP Changes (attachment 5C-2, green cover), pp. III-5,6,7 on policies: These are more complete and somewhat more detailed than before; we welcome the change, especially those on open space. We still urge including significant native ecosystem examples among the areas to be preserved.

Ditto, p. VI-5: The last paragraph under "Caveats" indicates some approval of past growth control efforts, however limited. This approach should carry back into Chapter IV, part B-1, replacing the unnecessarily derogatory assumption that current reforms are too extreme.

Ditto, p. VII-5: Under implementation and enforcement, add Regional Water Quality Control Boards as an enforcer.

Resolution #88-270-2, pp. 5-7, Overriding Considerations: Why is there no discussion of limiting total employment growth? Is every kind of job welcome in Southern California, even those which involve outright exploitation of people and the environment (polluters, for instance). SCAG should look into standards for evaluating the quality of growth in jobs as well as in housing and the quality of life. In fact, they overlap in their effects.

Mitigation Measures: We note that there are two lists to be included in the revised reports, one in Res. #88-270-2 on the Growth Management Plan and the other in Res. #88-270-6 on incorporating the Mobility and Growth Management Plans into the Air Quality Management Plan. There seems to be some overlap between the two but they have different category systems, making evaluation difficult if not impossible. We urge that they be consolidated into a single list gathering all the impacts on each topic (e.g. Air Quality or Land Use) together to eliminate overlaps. If a mitigation measure affects more than one topic that should be noted wherever the full discussion is placed and cross-referenced under the other topic headings.

Generally speaking, we agree with most of the mitigations proposed. It would be very useful to the readers to know where and when specific measures have been adopted rather than merely proposed (e.g. first item on p. 8 and third one on p. 16 of #88-270-2). More specific comments and suggestions follow:

Resolution #88-270-2?

p.11: Revising and enforcing air quality regulations to support jobs/housing balance - How will SCAG avoid worsening air pollution in job-poor areas?

Redevelopment in job-poor areas - How will SCAG secure assistance for people displaced by such projects?

p.12. Economic development in outlying job-poor areas - How will SCAG avoid stimulating further outward spread of development to house the new population attracted by the jobs?

p.13. Preserving and developing parks in highly urbanized areas. This is important and needs to be inserted into the Plan itself. In particular we urge language that will discourage governments from intruding such items as city halls, museums and police academies (non-park uses) on the most precious park lands.

p. 15. Water conservation: This also is important enough to get more emphasis in the Plan.

p. 17. L. A. County solid waste mitigation - Order of priorities should be reversed and "reduction, reuse and recycling" should precede "recovery" Similar changes are needed in remarks about other counties.

p.26. Significant habitats - Does this include all significant ecological areas, (e.g. in L. A. County). It should and categories clarified if needed.

p.18. Plan adoption - All county and regional have been prepared and include waste reduction. They have not been adopted as of this date.

p.27. Habitat fragmentation - These excellent ideas should not merely be considered. SCAG should urge their implementation where appropriate.

p. 28. Loss of habitat - Same comment.

p. 29. Recreational impacts - Same comment.

Tree vigor and mortality - Why limit research to coniferous varieties? It is needed especially on broad-leaved street trees.

Glad to see one more call for implementing Air Quality Management Plan. Each Plan should support the others as fully as possible.

Resolution #88-270-6:

pp. 4,5. Noise, light and glare - Not enough attention is paid to landscape design and planting mitigations of these impacts.

p. 6. Transportation - Include car and van pooling, staggered hours and other traffic management techniques as mitigations.

p. 10. Plant life - "Protect" should replace "consider".

Land Use - "And other development regulations" should be added after "zoning changes".

Population - Jobs/housing balance is the principal mitigation for increased commuting trips.

p. 11. Population - Residential displacement - Include transit as well as freeway expansion.

p.16. Utility facilities - Better land use planning is an important mitigation for the effects of power transmission.

Ditto - More co-generation facilities is another mitigation for reliance on only one type of power source.

p. 17. Economic - Mitigations should include the various methods of reducing transportation costs, especially as they apply to low-income people.

Thank you for your courtesy in providing the new material. We hope these additional comments are helpful and will be reflected by corresponding changes in the Growth Management Plan.

Sincerely yours

Stephen A. Kaufman

Stephen A. Kaufman, Chairman
Urban Environment/ Land Use Subcommittee



HARRIETT M. WIEDER

SUPERVISOR, SECOND DISTRICT

ORANGE COUNTY HALL OF ADMINISTRATION

10 CIVIC CENTER PLAZA, P. O. BOX 687, SANTA ANA, CALIFORNIA 92702-0687

PHONE 834-3220 (AREA CODE 714)

February 1, 1989

Mr. Don R. Griffin, Chairman
Southern California Association of Governments
600 South Commonwealth Avenue, Suite 1000
Los Angeles, California 90005

SUBJECT: February 2 Executive Committee Agenda Items 6 A. and B.

Dear Chairman Griffin and Executive Committee Members:

Unfortunately, I am unable to attend Thursday's Executive Committee meeting due to a prior commitment. I am booked as a speaker at the Orange County Chamber of Commerce's annual luncheon and am unable to break the commitment. However, I would like to offer an observation relative to the two agenda items cited above.

Both agenda items involve discussions going on in Orange County and the rest of the region relative to the manner and structure within which regional planning is accomplished. Mark Pisano has recommended that an Intra-Regional Task Force be established to recommend changes in SCAG's structure to the Executive Committee. I am concerned that the discussion leading up to the task force recommendation indicates that the problem stems from local government's approach rather than something that might be inherent in the present regional structure.

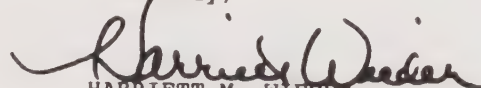
First, the discussion indicates that "a number of legislative and legal actions...call into question the approaches that local government uses to address regional issues." Second, the report notes that SCAG's Blue Ribbon Committee recommended that "a task force be formed to address the issue of how local government addresses regional problem solving." I believe the questionable effectiveness of regional planning in our region stems from the current centralized structure and system of planning at the regional level; e.g., SCAG's existing structure.

A most dramatic example of this point was brought to my attention only today. SCAG's Energy and Environment Committee unanimously voted on January 26, 1989, to remove Orange County's San Joaquin Hills Transportation Corridor from the Regional Mobility Plan. The motion was made by an elected official who lives far from Orange County. An Orange County elected official did second the motion, but she hails from the lone city out of 8 jurisdictions in the corridor's area of benefit that does not participate in the transportation corridor agency. The point here is that a major new freeway for Orange County--financed mostly by Orange County--is being deleted from the Regional Mobility Plan by a group far removed from the concerns and interests of the majority of affected Orange County elected officials. Imagine an urgent and important transportation project in your county or city being threatened by the actions of a distant group who have no accountability to your constituents and seemingly no sensitivity to sub-regional concerns. This EEC recommendation should not be pursued further.

I firmly believe the example cited above illustrates clearly why Orange County believes the regional planning process should be de-centralized. An inter-active planning process such as that contemplated in the draft Orange County Regional Association MOU --where county geographic level regional plan components are prepared and consistency with other components assured by SCAG-- is a far better system and structure for regional planning than SCAG as it is presently organized. It would certainly facilitate a greater sensitivity to local concerns while simultaneously promoting more involvement by local government in regional planning. The problem, as I see it, is one of how the present regional planning apparatus is structured and not due only to the problem solving approaches of local government. To suggest anything else implies irresponsibility on the part of all of us as local elected officials.

Thank you for the opportunity to share Orange County's thoughts.

Sincerely,


HARRIETT M. WIEDER
Supervisor, Second District



Energy and Environment Committee, January 26, 1989

Amendment to EEC Motion by Member Lida Lenney, Mayor Pro Tem, Laguna Beach:

The Committee has a concern that the environmental impacts are so significant that it's not worth it, or the mobility improvement isn't worth the environmental impacts, and we recommend deleting the toll road from the Plan and seek a 30-day delay and staff work to assess the impact of this deletion. Passed by unanimous vote.

Motion: To certify the RMP E.I.R. and adopt the Mobility Plan. Passed by unanimous vote.

APPENDIX III. THE 1988 SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS'
RESOLUTIONS ON THE FINAL ENVIRONMENTAL IMPACT REPORT AND
ON THE FINAL GROWTH MANAGEMENT PLAN



600 South Commonwealth Avenue • Suite 1000 • Los Angeles • California • 90005 • 213/385-1000

RESOLUTION #89-272-1

RESOLUTION OF THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS FOR CERTIFICATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT PREPARED FOR THE 1988 GROWTH MANAGEMENT PLAN

WHEREAS, the Southern California Association of Governments (SCAG) is the designated areawide planning agency and has prepared the 1988 Growth Management Plan for adoption; and

WHEREAS, the California Environmental Quality Act (California Public Resources Code, Section 21000 et seq.) requires that the Environmental Impact Report be reviewed and considered by the Executive Committee of SCAG prior to the adoption of the 1988 Growth Management Plan; and

WHEREAS, the Final Environmental Impact Report (FEIR) for the 1988 Growth Management Plan before the Executive Committee this day consists of the following components:

1. Draft Environmental Impact Report for the 1988 Growth Management Plan, October 1988 (SCH # 88062924),
2. Purpose and Format of the FEIR, including the List of Persons, Organizations and Public Agencies Commenting on the Draft EIR,
3. Revised Summary Table on the Environmental Areas Examined in the Draft EIR,
4. Copies or Summaries of the Comments and Recommendations Received on the Draft EIR (including public hearings),
5. Responses to Significant Environmental Points Raised in the Review and Consultation Process,
6. Revisions to the Draft EIR; and

WHEREAS, SCAG, pursuant to the State Guidelines for the California Environmental Quality Act (Article 7, Section 15091), has written findings with supporting statements of fact for each significant effect of the 1988 Growth Management Plan, and has attached these findings and statements of

Resolution #89-272-1
Page 2 of 2
February 2, 1989

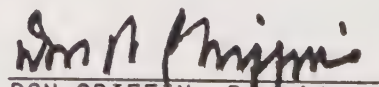
fact to the SCAG Resolution of Adoption for the 1988 Growth Management Plan (Resolution #89-272-2) as Exhibit "A," and hereby incorporates by reference such findings and statements of fact in this certification of the 1988 Growth Management Plan Environmental Impact Report; and

WHEREAS, SCAG, pursuant to Section 21081.6 of the California Public Resources Code has developed, as part of its findings, a proposal for a monitoring and reporting program for the 1988 Growth Management Plan Environmental Impact Report's mitigation measures; and

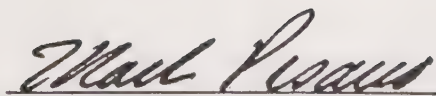
WHEREAS, SCAG, pursuant to the State Guidelines for the California Environmental Quality Act (Article 7, Section 15093), has prepared a Statement of Overriding Considerations to be attached as Exhibit "B" to the Resolution of Adoption for the 1988 Growth Management Plan (Resolution #89-272-2), and hereby incorporates by reference such Statement of Overriding Considerations in this Certification of the 1988 Growth Management Plan Environmental Impact Report;

BE IT RESOLVED that the Executive Committee of SCAG hereby certifies that the Final Environmental Impact Report for the 1988 Growth Management Plan has been completed in compliance with the California Environmental Quality Act and declares that prior to the approval of the 1988 Growth Management Plan, the Executive Committee has reviewed and considered information contained therein.

Approved by the Executive Committee of the Southern California Association of Governments at a regular meeting this 2nd day of February 1989.


DON GRIFFIN, President

Attest:


MARK A. PISANO, Executive Director



600 South Commonwealth Avenue • Suite 1000 • Los Angeles • California • 90005 • 213/385-1000

RESOLUTION # 89-272-2

**RESOLUTION OF THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
FOR ADOPTION OF THE
1988 REGIONAL GROWTH MANAGEMENT PLAN**

WHEREAS, the Southern California Association of Governments (SCAG) is the designated areawide planning agency for the Southern California region, and as such is responsible for the preparation and adoption of the Growth Management Plan; and

WHEREAS, pursuant to this authority, SCAG has prepared the 1988 Growth Management Plan; and

WHEREAS, a Final Environmental Report for the 1988 Growth Management Plan has been certified by the SCAG Executive Committee;

BE IT RESOLVED that the Executive Committee of the Southern California Association of Governments:

1. Adopts Exhibit "A", attached to this resolution, as the written finding of significant effects and supporting statements of fact required by the State Guidelines for the California Environmental Quality Act (Article 7, Section 15091), insofar as the Final Environmental Impact Report for the 1988 Growth Management Plan identifies significant environmental effects associated with this project.
2. Adopts Exhibit "B", attached to this resolution, as the written Statement of Overriding Considerations required by the State Guidelines for the California Environmental Quality Act (Article 7, Section 15093), insofar as the 1988 Growth Management Plan presents unavoidable environmental risks identified in its Final Environmental Impact Report.
3. Adopts the 1988 Regional Growth Management Plan.

Resolution #89-272-2
Page 2 of 2
February 2, 1989

Approved by the Executive Committee of the Southern California Association
of Governments at a regular meeting this 2nd day of February 1989.


DON GRIFFIN, President

Attest: 
MARK A. PISANO, Executive Director

EXHIBIT "A"

STATEMENT OF FINDINGS FOR 1988 DRAFT GROWTH MANAGEMENT PLAN

In accordance with the California Environmental Quality Act (CEQA) Guidelines (Title 14, Division 6, California Administrative Code, Section 15091), the SCAG Executive Committee cannot adopt the 1988 Draft Growth Management Plan (GMP) if it will result in one or more significant effects, unless the committee makes one or more of the following written findings for each significant adverse effect:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. [15091(a)(1)]
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. [15091(a)(2)]
3. Specific economic, social, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final EIR. [15091(a)(3)]

Table 1 presents findings for the 1988 Draft GMP. This table includes a summary of all significant environmental impacts associated with implementation of the proposed project and all applicable mitigation measures identified in the Draft EIR, a specific finding for each mitigation measure or set of measures, and supporting facts.

The ability of the alternatives examined in the EIR to reduce the proposed project's significant impacts and the feasibility of implementing the alternatives are discussed below.

Alternatives Considered by SCAG in the DEIR

Alternatives analyzed in the DEIR featured varying distributions and aggregate levels of regional growth. These alternatives were based on economic, demographic, and technological trends; state and local forecasts; and SCAG jobs/housing balance objectives. Each of the DEIR alternatives is summarized below.

GMA-1: Baseline Projection (No-Project) Alternative

This alternative assumes the same amount of regional growth as the proposed project but a different spatial distribution of future employment and housing (no adjustment for jobs/housing balance). GMA-1 is based on demographic and economic trends of the late 1970s and early 1980s, expected

effects of growth management policies adopted by 1987, and continuation of existing government policies.

GMA-2: Jobs/Housing Balance Alternative

This alternative assumes the same amount of regional growth as the proposed project but a different spatial distribution of future employment and housing. Under GMA-2, approximately 12 percent of projected employment growth would be redirected from job-rich to job-poor areas within the region, and 6 percent of projected housing growth would be redirected from housing-rich to housing-poor areas.

GMA-3: Local Plans Alternative

This alternative assumes the same amount of regional growth as the proposed project but a different spatial distribution of future employment and housing. GMA-3 incorporates lower Orange County population and employment growth forecasts than those under GMA-1, based on Orange County recommendations, and redistributes the additional growth that would otherwise be expected to occur in Orange County to other areas within the region.

GMA-4: Emerging Futures Alternative

This alternative assumes the same amount of regional growth as the proposed project but a different spatial distribution of future employment and housing. GMA-4 growth projections are based on jobs/housing balance objectives, but give greater weight to recent growth pressures, government actions, and trends (primarily telecommuting) that could alter the pattern and impacts of future development.

GMA-Low Alternative

This alternative forecasts a lower rate of regional growth than the proposed project, based on State Department of Finance county population projections, assuming reduced ethnic fertility rates. GMA-Low would result in a 2010 population of 17.1 million (6.1 percent less than under the proposed project). Regional housing and employment levels would be 2.2 and 2.4 percent lower, respectively, under GMA-Low than under the proposed project.

GMA-High Alternative

This alternative forecasts a higher rate of regional growth than the proposed project, based on 1983-1987 population growth trends and a higher national economic forecast by the U. S. Bureau of Labor Statistics. GMA-High would result in a 2010 population of 20.2 million (10.6 percent more than under the proposed project). Regional housing and employment levels would be 10.5 and 3.8 percent higher, respectively, under GMA-High than under the proposed project.

Findings Concerning Plan Alternatives

Prior to adopting the proposed project, SCAG has considered all of the alternatives presented in the Draft EIR and Final EIR and finds that alternatives other than the proposed project do not lessen the significant impacts associated with the proposed project; are environmentally inferior; and/or are infeasible based on economic, social, and other considerations as set forth below.

Infeasibility of GMA-1 (No-Project) Alternative

Due to an increased jobs/housing imbalance within the region, this alternative would substantially increase commuting, traffic congestion, and air pollution over that expected under the proposed project. These environmental effects would constrain the region's ability to attract and retain employers and to foster a quality living environment for residents. SCAG therefore finds this alternative to be environmentally inferior to the proposed project.

Infeasibility of GMA-2 (Jobs/Housing Balance) Alternative

Overall, the proposed project and GMA-2 have similar jobs/housing balance impacts and environmental impacts associated with jobs/housing, such as vehicle miles traveled, vehicle hours traveled, delay, and air quality. The greatest differences between the proposed project and GMA-2 occur in Imperial County and the mountain/desert subregion; in both areas the proposed project would do more to improve the jobs/housing balance than GMA-2.

This alternative is based on demographic and economic trend data from the 1970s through 1984, which are inconsistent with more recent growth trends and are a less valid basis for growth forecasting than the more recent trend data (1984-1988) used to develop the proposed project. SCAG therefore finds that economic and social considerations make it infeasible to adopt this alternative.

Infeasibility of GMA-3 (Local Plans) Alternative

This alternative would slightly increase the jobs/housing imbalance within the region over that projected under the proposed project. This alternative would not lessen the significant impacts associated with the proposed project.

In addition, this alternative would be inconsistent with substantially higher growth projections for Orange County (Wells Fargo Bank, October 1988, page 18), would limit the region's flexibility in allocating future growth among counties and subregions, could result in large-scale economic segregation (Draft Growth Management Plan, page VI-2), and would increase environmental impacts in areas other than Orange County. SCAG therefore finds that economic and social considerations make it infeasible to adopt this alternative.

Infeasibility of GMA-4 (Emerging Futures) Alternative

This alternative would slightly increase the jobs/housing imbalance within the region over that projected under the proposed project. This alternative would not lessen the significant impacts associated with the proposed project.

Infeasibility of GMA-Low Alternative

This alternative would slightly increase the jobs/housing imbalance within the region over that projected under the proposed project. This alternative would not lessen the significant impacts associated with the proposed project.

In addition, this alternative would be inconsistent with current regional growth projections. Recent studies indicate that the GMA-Low employment levels are too conservative and that the GMA-Low ethnic fertility rates are too low. The Center for Continuing Study of the California Economy and the National Planning Association estimate that regional employment in 2010 will be 9,300,000-9,500,000 (6.4-8.7 percent higher than expected under GMA-Low). Another study forecasts 11,645,000 regional jobs in 2010 (Wells Fargo Bank, October 1988), 33.3 percent higher than the number expected under GMA-Low. For the above reasons, SCAG finds that economic and social considerations make it infeasible to adopt this alternative.

Infeasibility of GMA-High Alternative

Due to higher projected levels of development and an increased jobs/housing imbalance within the region, GMA-High would result in greater environmental impacts than the proposed project. SCAG therefore finds this alternative to be environmentally inferior to the proposed project.

EXHIBIT "B"

STATEMENT OF OVERRIDING CONSIDERATIONS

WHEREAS, the Southern California Association of Governments (SCAG) has determined that the Draft GMP preferred alternative, GMA-4 Modified Jobs/Housing (the proposed project), would result in significant unavoidable impacts including:

- o urbanization of approximately 650,000 acres and conversion of agricultural and open space lands;
- o exceedance of the Draft 1988 Air Quality Management Plan target emission levels (amount of emissions that could be produced in the South Coast Air Basin without violating federal air quality standards) for reactive organic gases and nitrogen oxide. (If the technological breakthroughs required by the Tier III control measures become a reality, these target emission levels could be met.);
- o exceedance of 1982 Air Quality Management Plan 2000 emissions estimates for carbon monoxide, which assume implementation of recommended control measures;
- o exceedance of normally acceptable noise levels at some locations; and
- o increased exposure to seismic hazards; and

WHEREAS, SCAG has further determined that there are no feasible mitigation measures or alternatives available that would reduce such impacts to less-than-significant levels;

SCAG hereby makes this Statement of Overriding Considerations in accordance with Section 15093 of the State CEQA Guidelines. For the reasons set forth below, SCAG finds that the benefits of the project to the southern California region outweigh the significant unavoidable adverse impacts. SCAG concludes that the project should be approved notwithstanding such significant unavoidable adverse impacts.

1. Employment Generation. Adoption and implementation of the proposed project would result in the creation of approximately 3,031,000 new jobs (Draft EIR, page 2-9). These new jobs would have substantial positive effects on households, businesses, and jurisdictions within the region by increasing employment opportunities, incomes, and tax revenues.

The beneficial effects of increased employment include expanded economic opportunities for existing and future residents, reduced rates of unemployment and costs of social services, more stable and prosperous communities, a greater range of choices for workers and consumers, improvement of economic conditions in lower income areas, and an economic infrastructure that fosters business growth and innovation. Economic growth within the SCAG region is projected to double the gross regional product and increase real per capita incomes by an average of more than 50 percent (greater increases for

Hispanics) by 2010. (Wells Fargo Bank, October 1988, pages 2, 14, 18, 26, 28, 30, and 38).

2. Housing Development. Adoption and implementation of the proposed project would result in a net increase of 2,669,205 dwelling units throughout the region (Draft EIR, page 2-8). This increase in the region's housing stock would accommodate the 5,854,000-5,873,500 increase in population that is projected to occur based on economic growth forecasts (Wells Fargo Bank, October 1988; Draft EIR, page 2-7). In the aggregate, this level of housing development would satisfy future estimated regional housing supply needs, consistent with California Department of Housing and Community Development policy (Regional Housing Needs Assessment 1988).

The beneficial effects of housing development include expanded housing opportunities for current and future residents, improvement in housing conditions in redevelopment areas, and a housing market that supports continued economic growth within the region.

3. Jobs/Housing Balance. The proposed project would substantially reduce the projected imbalance of jobs and housing units that would occur under the No-Project Alternative by encouraging greater housing development in job-rich areas and greater economic development in housing-rich areas (Draft EIR, pages 2-25, 2-26, and 2-28). Compared with the No-Project Alternative, the proposed project would substantially improve traffic conditions and air quality by reducing commutes (Draft EIR, pages 7-20 and 8-29). The beneficial effects of reduced commuting would also include lower transportation and energy costs, less family and societal stress, increased productivity, greater community stability and diversity, and reduced disparities in tax burdens among cities and counties.
4. Regional and Community Resources. Adoption and implementation of the proposed project would result in a net regional population increase of 5,873,500 (Draft EIR, page 2-7) and increased ethnic diversity. It is expected that these demographic changes and the economic growth described above would reduce expansion and diversification of various facilities and programs for education, the arts, and other civic or recreational activities, as has occurred previously in urban and suburban areas of the region due to business development and immigration (The Atlantic Monthly, January 1988, pages 41-44; Wells Fargo Bank, October 1988, page 14). The Atlantic Monthly noted that, "As Los Angeles has become richer, more populous, and more ethnically diverse over the past decade, it has also become more sophisticated" (The Atlantic Monthly, January 1988, page 44).

Sources:

Wells Fargo Bank N.A., Economics Division (San Francisco), The Southern California Economy: Toward the 21st Century, October 1988.

Charles Lockwood and Christopher B. Leinberger, "Los Angeles Comes of Age," The Atlantic Monthly, January 1988.

SCAG, Regional Housing Needs Assessment, June 1988.

Table 1. Findings on Specific Draft Growth Management Plan Impacts Identified in the EIR

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
POPULATION, EMPLOYMENT, AND HOUSING	Net increase of 5.87 million persons, 2.67 million housing units, and 3.03 million jobs.	Yes	Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency (State CEQA Guidelines, Section 15091(a)(2)). Local, regional, and state agencies exercise authority over land use and infrastructure planning, funding, and construction of new facilities, and implementation of various other mitigation measures (e.g., those required to reduce traffic congestion and improve air quality).
	Proportional decline of the White population and growth of the Hispanic, Black, and Asian/other populations.	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.
	Local jurisdictions and other service providers should provide accessible and effective services to members of all ethnic groups in the population particularly to those that have special needs (e.g., immigrants and lower-income households); and	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.
	Local jurisdictions and community leaders should support efforts to increase the representation of minority groups among elected and appointed positions where such representation has been substantially lower than the proportion of such groups in the general population; and	Yes	15091(a)(2)
	Local jurisdictions should implement RHNA and other programs that would increase housing opportunities for lower-income ethnic minority households, particularly in areas of the region outside Los Angeles County.	Yes	15091(a)(2)

Table 1. Continued

IMPACT CATEGORY / Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
Growth of the 65+ age group and decline of the 0-17 age group.	Local jurisdictions and other service providers should provide accessible and effective health care and social services to members of all age groups in the population, particularly to those that have special needs (e.g., immigrants, lower-income households, and the elderly); and	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.
	Public agencies and private organizations should support or provide adequate public education, job training, housing, child care, and public assistance programs for children, families, and younger adults as needed.	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.
Decreased household size could increase the demand for housing and per capita housing costs and the demand for social services.	Local jurisdictions and service providers should improve and expand the supply of affordable housing, as called for in the RHNA, as well as social services, particularly for single-parent families and the elderly. Measures such as the following could be considered:	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.
	<ul style="list-style-type: none"> o identify local housing needs and develop programs to address these needs in conjunction with nonprofit and for-profit developers. Objectives of such programs could include maintaining and improving existing subsidized and below-market-rate housing, constructing new below-market-rate units, providing financial and technical housing assistance to lower income households, promoting redevelopment projects that improve or increase the stock of affordable housing, and acquiring or reserving sites for affordable housing projects (landbanking); o expand existing funding and develop new funding sources as needed to support housing programs; and o implement measures identified below under "Health Care and Social Services." 		
Potential for decreased housing affordability.	Refer to measures identified immediately above.	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
Growth in the share of employment in the services sector and decline of the share of employment in the manufacturing sector (as well as changes within the sector).	<p>Local jurisdictions, employers, and service agencies should implement measures to upgrade skill levels and adapt to changes in the economy, such as:</p> <ul style="list-style-type: none"> o job retraining of low-skilled workers for middle- and high-skilled jobs; and o job retraining of displaced workers due to structural changes in the economy; and o improving primary, secondary, and higher education programs to prepare the future labor force for future job opportunities; and o providing opportunities in small-to-medium sized businesses where most new job creation would occur. 	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.
Increased jobs/housing imbalance over 1984 among subregions and counties.	<p>Subregional and local jurisdictions should implement strategies to improve the regional and subregional J/H imbalance. The following measures could be considered:</p> <ul style="list-style-type: none"> o in housing-poor areas, increase the amount and density of planned future residential development and/or reduce the amount of planned future commercial and industrial development through general plan revisions, zoning ordinances, and development incentives or conditions. Implementation of such measures could be a condition of consistency with regional plans and regulatory compliance; o in job-poor areas, increase the amount of planned future commercial and industrial development and/or reduce the amount of planned future residential development through general plan revisions and zoning ordinances, and development incentives or conditions. Implementation of such measures could be a condition of consistency with regional plans and regulatory compliance, as applicable; 	Yes	15091(a)(2)

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
	<ul style="list-style-type: none"> o impose developer fees on commercial and industrial projects in job-rich subregions to cover external costs associated with imbalanced development, and use fee revenues to build regional transportation infrastructure, mitigate air pollution effects of imbalanced growth, increase economic development programs in job-poor subareas, and facilitate housing development in job-rich subareas; o impose developer fees on housing projects in housing-rich subregions to cover external costs associated with imbalanced development and use fee revenues as described above; o revise and enforce air quality regulations (e.g., the South Coast Air Quality Management District New Source Review Rule and the Regional Air Standards Attainment Plan) to support J/H balance by restricting economic development in job-rich areas and favoring economic development in job-poor areas; o monitor J/H balance performance as a condition of "Reasonable Further Progress" under the 1988 AQMP and restrict the flow of federal funds to those areas which fail to comply; o encourage redevelopment projects in job-poor areas; o reallocate property and sales tax revenues from job-rich to job-poor areas by developing an intra-regional tax-revenue sharing system similar to the one established in the Minneapolis-St. Paul, Minnesota region since 1975; 		

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
	<ul style="list-style-type: none"> o implement growth management programs on a regionwide level by using local police powers to provide for more balanced growth (e.g., by phasing or structuring capital improvement programs so as to shape the pattern and timing of growth and by enacting ordinances requiring that growth be restricted as necessary to maintain minimum levels of service provided by local infrastructure systems); o expand and improve infrastructure system (e.g., transportation, wastewater, schools, and recreation facilities), giving highest priority to projects that would promote job growth in job-poor areas or would promote housing growth in housing-poor areas, limiting funding for projects that would generate employment growth in job-rich areas or would generate housing growth in housing-rich areas by jointly developing and funding a regional capital improvement program or establishing intergovernmental agreements; o locate new major job-inducing public facilities (e.g., universities, airports, and government service and trade centers) in job-poor areas; o encourage economic development in outlying job-poor areas by promoting the development of an extensive and active telecommunications network in the region that facilitates business location and development of those areas; o target limited state and federal economic development funds (where possible); with the highest priority being given to projects that promote job growth in job-poor areas (targeting jobs that match the skill levels of the unemployed and under-employed in those areas) and assist residents of job-poor areas in relocating to areas with expanding job opportunities; 		

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
LAND USE AND CULTURAL RESOURCES	<ul style="list-style-type: none"> o establish consistency with regional J/H balance objectives as a prerequisite or condition of incorporations approved by Local Agency Formation Commissions; and o implement measures that would further housing development objectives of the RHNA, including the increased use of redevelopment revenues for development of affordable housing. 		
Urbanization of approximately 650,000 acres and conversion of agricultural and open space lands	<p>None available. The following measures would partially reduce this impact, but not to a less-than-significant level.</p> <ul style="list-style-type: none"> o Refer to measures identified under the following impact categories: land use and cultural resources, ecological resources, and geology and hydrology. o Local jurisdictions should consider limiting the extent of the adverse effects of urbanization of open, vacant, undisturbed, or agricultural lands by encouraging infill development at increased densities in areas that are already urbanized or are designated for urbanization rather than development of rural or outlying areas; implementing land use controls that discourage development of prime agricultural land; and encouraging the preservation and development of open space areas and parks within highly urbanized areas. 	<p>No</p> <p>No</p>	<p>15091(a)(2); mitigation measures would partially reduce the impact, but not to a less-than-significant level.</p> <p>15091(a)(2); mitigation measures would partially reduce the impact, but not to a less-than-significant level.</p>
Incorporations and annexations	Eligible voters, local jurisdictions, Local Agency Formation Commissions, and applicable regional and state agencies should authorize incorporations, annexations, and special district formations or changes that would result in the maximum feasible conservation of undeveloped land, the most efficient delivery of public services, and the least fiscal imbalance among all affected jurisdictions.	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
Possible damage, destruction, or removal of recorded and unrecorded cultural resources	<p>Local jurisdictions should require that the following measures be undertaken, prior to approving development, to protect cultural resources:</p> <ul style="list-style-type: none"> o map areas of prime cultural resource significance; o consult with the appropriate archeological or historical information center and clearinghouse (i.e., University of California at Los Angeles, University of California at Riverside, San Bernardino County Museum, or Imperial Valley College Museum) to identify known cultural resources and potential cultural resources that could be found on land proposed for development; and o implement an archeological field survey if a development area is identified as "sensitive." If the field survey identifies significant cultural resources, preservation and mitigation measures should be recommended. 	Yes	15091(a)(2)
PUBLIC SERVICES			
Water Supply			
Regional water supply shortfall of approximately 1.2 million acre-feet (MAF) (12.6 percent shortfall) in 2010, of which 0.8 MAF (18.6 percent shortfall) would occur in the coastal plain subregion and 0.4 MAF (7.7 percent shortfall) in the outlying subregion	<p>The Metropolitan Water District of Southern California and other water providers in the region should increase dependable annual supplies at a regional level by 2010 to approximately 9.5 MAF and make the fullest use of existing resources by implementing the following measures as needed:</p> <ul style="list-style-type: none"> o increase State Water Project (SWP) yields through implementation of a Coordinated Operation Agreement between the State and the U. S. Bureau of Reclamation; completion of various Delta facility capacity improvements, offstream storage programs, Central Valley Project and other SWP programs; and implementation of water transfer agreements; 	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
Water Quality	<ul style="list-style-type: none"> o obtain maximum use of Colorado River supplies; o store up to 3.0 MAF of surplus water in groundwater basins; and o make optimum use of existing resources and minimize adverse effects of supply shortfalls by local wastewater reclamation, groundwater protection, groundwater treatment, water conservation, surface water storage, and drought contingency planning projects. 		
	Degradation of surface water, groundwater, and marine water quality	Yes	15091(a)(2)
	Under direction of the U. S. Environmental Protection Agency, the State Water Resources Control Board, Regional Water Quality Control Boards, and local and regional agencies should administer National Pollutant Discharge Elimination System permits for point dischargers and implement comprehensive basin plans for groundwater protection and treatment; and	Yes	15091(a)(2)
	Applicable jurisdictions and agencies should continue their influence and expand local coastal zone planning and management programs in conjunction with the state to prevent or reduce adverse effects on coastal water quality and to preserve or improve areas of special importance such as bays and estuaries; and	Yes	15091(a)(2)
	Local jurisdictions should implement regional air quality mitigation measures to reduce or eliminate the potential adverse water quality effects of lead fallout and acid precipitation; and	Yes	15091(a)(2)

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
	Local jurisdictions and water providers should mitigate groundwater quality problems by improving groundwater basin management as recommended in Regional Water Quality Control Board groundwater basin plans using various methods, including: conjunctive use of surface water, groundwater, and reusable wastewater; appropriate use of artificial recharge; and controls on development in recharge areas; and	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.
	Local jurisdictions should mitigate adverse effects of water pollution from nonpoint and other sources by implementing measures in SCAG's Areawide Waste Treatment Management Plan, including: implementing plans for containing and cleaning hazardous substance spills; strengthening and enforcing local management controls on construction site erosion and sediment control; implementing best management practices to control water pollution from agricultural areas; implementing improved street, litter, catchbasin, inlet basin, and store drain cleaning programs; and implementing measures to limit runoff and minimize peak flows from developing areas.	Yes	15091(a)(2)
Wastewater Treatment			
Increased daily wastewater treatment demand to approximately 2,171 million gallons, exceeding available treatment capacity as follows:	The 1979 Areawide Waste Treatment Management Plan (208) should be updated to be consistent with the GMP and AQMP; and	Yes	Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final EIR (State CEQA Guidelines, Section 15091[a][1]);
San Bernardino County - 51 percent	To accommodate peak flows and to provide for a capacity reserve of approximately 10 percent, wastewater collection and treatment facilities may need to be upgraded to the following 2010 capacity levels (percent over existing and funded capacity):	Yes	15091(a)(2)
Riverside County - 45 percent			

IMPACT CATEGORY / Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
Los Angeles County - 19 percent	o Ventura County - 130 million gallons per day (MGD) (34)		
Imperial County - 15 percent	o Los Angeles County - 1,850 MGD (65)		
Orange County - 5 percent	o Orange County - 510 MGD (47)		
	o Riverside County - 210 MGD (106)		
	o San Bernardino County - 300 MGD (108)		
	o Imperial County - 23 MGD (64)		
Solid Waste			
Depletion of existing landfill capacity by the following years:	A comprehensive regional solid waste manage- ment plan should be developed and implemented by counties within the region, and this plan should include waste reduction, reuse, and recycling programs.	Yes	15091(a)(1); SCAG will develop a comprehensive regional solid waste management plan.
Ventura County - 1989			
San Bernardino County - 1990	The following counties, in their respective solid waste management plans, should require the following improvements, as identified by the California Waste Management Board:	Yes	15091(a)(2)
Orange County - 1995			
Los Angeles County - 1996	o Ventura County - complete the major expansion of an existing landfill and develop a new landfill;		
Imperial County - 2008	o Los Angeles County - expand existing landfills, develop new landfills, and implement resource recovery projects;		
Riverside County - 2008	o Orange County - expand two existing landfills and develop a new landfill;		
	o Riverside County - expand one landfill and develop two new landfills;		
	o San Bernardino County - develop plans to expand one landfill; and		
	o Imperial County - develop plans to expand landfills.		

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
Hazardous Waste			
Generation of approximately 1.14-1.48 million tons of offsite hazardous waste in 2010	The Southern California Hazardous Waste Management Authority and each of its member counties should adopt and implement hazardous waste management plans that include waste reduction programs; and	Yes	15091(a)(2)
	Hazardous waste management entities should increase the annual regional hazardous waste management capacity to 1.5 million tons by 2010 by establishing new disposal and treatment facilities.	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.
Schools			
Demand for approximately 677 additional schools and 31,000 additional teachers	Local school districts should implement the following measures as needed:	Yes	15091(a)(2)
	<ul style="list-style-type: none"> o increase transportation of students from overcrowded schools to schools with surplus space; o increase the capacity of all existing facilities through extended (e.g., year-round) schedules or other means; o build approximately 677 new schools by 2010, including 582 elementary and junior high schools and 95 senior high schools; o assess maximum allowable school impact fees as authorized by AB 2926 and use fee revenues to provide interim and permanent facilities; o if fee revenues and state funding are not sufficient to acquire school sites and provide new facilities, establish alternative financing mechanisms, such as community facility districts, to generate needed revenues or negotiate agreements that provide for site dedication and/or school construction by private parties; 		

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
Law Enforcement	<ul style="list-style-type: none"> o hire additional qualified administrative, teaching, and support staff, including at least 31,000 new teachers; and o provide educational programs that meet the educational needs of all students, particularly those whose English speaking ability is limited or who are otherwise disadvantaged. 		
Need for approximately 11,430 additional police officers and sheriffs and additional facilities (above 1984 levels)	<p>Law enforcement entities should provide needed police personnel, facilities, and equipment, as required by new development, by implementing the following measures, as needed:</p> <ul style="list-style-type: none"> o implement programs to reduce the crime rate, including drug and gang prevention programs and education, job training, and community activities for youth and young adults; o place greater reliance on developers to provide needed services and facilities; o achieve better efficiency in the delivery of police protection services and use of facilities through consolidation of services, better use of underutilized facilities, and redefinition of service district boundaries to achieve better efficiencies of scale; o use new technologies and policies that increase system efficiencies and reduce demands; o require that services, such as private surveillance, be contracted to the private sector in those instances where they can be provided more efficiently and at less cost; o promote greater responsibility for nongovernmental provision of certain services or facilities at the neighborhood or homeowner association level; and 	Yes	15091(a)(2)

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
Fire Protection	<ul style="list-style-type: none"> o require that development be phased according to the availability of adequate public services and facilities. 		
Need for approximately 7,100-10,970 additional fire protection personnel and additional facilities (above 1977 staffing level)	<p>Fire protection entities should provide needed fire personnel, facilities, and equipment, as required by new development, by implementing the following measures, as needed:</p> <ul style="list-style-type: none"> o reduce fire protection demands and costs by requiring adequate emergency access, applying land use restriction in high-risk areas and performance standards on high-risk activities, and incorporating standard fire prevention features into new development (such as automatic sprinklers); o implement fire safety education programs; o provide specialized training for fire personnel as needed; o achieve better efficiency in the delivery of fire protection services and use of facilities through consolidation of services, better use of underutilized facilities, and redefinition of service district boundaries to achieve better efficiencies of scale; o use new technologies and policies that increase system efficiencies and reduce demands; o promote greater responsibility for non-governmental provision of certain services or facilities at the neighborhood or homeowner association level; and o require that development be phased according to the availability of adequate public services and facilities. 	Yes	15091(a)(2)

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
Health Care and Social Services			
Increased need for health care services and facilities	Public and private health service providers should expand staff and facilities as needed. Facilities operating by 2010 should include at least 500 new skilled nursing facilities and additional hospitals, intermediate care facilities, and clinics. Providers should improve salaries and working conditions to attract and retain a sufficient number of skilled nurses and other medical personnel; and	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.
	Public agencies and private organizations should expand subsidized health care services and provide more comprehensive health insurance coverage to those who cannot afford the costs of services, particularly to families with young children, the elderly, and those with acute health care needs; and	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.
	Health service providers should develop and expand innovative, affordable, and cost-effective alternatives such as preventive care, adult day care, and home health care services.	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.
Increased need for public assistance	Local, state, and federal government agencies should increase the efficiency of the Food Stamps and MediCal programs to better serve those in need; and	Yes	15091(a)(2)
	Public agencies and private organizations should reduce the level of future demand for public assistance by jointly developing and implementing innovative and cost-effective education, job training, job placement, child care, and family support programs.	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.
Increased need for other social services.	Employers in the region should participate directly or indirectly in providing or supporting child care services; and	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.
	Service providers should develop and expand innovative, affordable, and cost-effective programs for delivering social services to the elderly, children, and the general population.	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
Energy			
Increased electricity and natural gas demand of approximately 60,740 Gigawatt-hours (Gwh) and 486 billion cubic feet (bcf) per year, respectively	<p>Utilities, local jurisdictions, and residents should participate in implementation of the following measures, as needed:</p> <ul style="list-style-type: none"> o reduce projected 2010 regional electricity demand by approximately 30 percent through energy conservation; o reduce projected 2010 regional natural gas demand by approximately 29 percent through energy conservation; o increase the use of renewable and alternative energy sources (e.g., wind and geothermal); and o apply measures recommended in the AQMP that would reduce overall generation of fossil fuel-based electricity within the air basin. 	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.
Increased annual motor fuel demand of approximately 250-768 million gallons per year	<p>Transportation agencies, local jurisdictions, employers, residents, and the automobile industry should participate in the implementation of the following measures, as needed:</p> <ul style="list-style-type: none"> o increase average vehicle fuel economy, particularly that of light-duty passenger vehicles, through technological change; o increase the use of vehicles with greater fuel economy through increased fuel costs, taxes, or other economic incentives; o increase the use of alternative or renewable energy sources (e.g., alcohol or other liquid fuels from biomass, hydrogen produced from solar or wind power, or the direct use of electricity generated by solar or wind power); 	Yes	15091(a)(2); in addition, entities other than public agencies are responsible for implementing mitigation measure.

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
TRANSPORTATION	<ul style="list-style-type: none"> o plan future growth so as to minimize transportation energy use by promoting mixed-use development, public transit, nonmotorized travel, and beneficial social or technological developments (e.g., telecommunications); and o reduce projected levels of future traffic congestion by implementing the preferred RMP strategy, as described in Chapter 7 of the DEIR. 		<p>Section 15091(a)(1); SCAG will adopt the Regional Mobility Plan preferred strategy.</p> <p>15091(a)(2); entities other than SCAG are responsible for implementing the RMP; in addition, entities other than public agencies are responsible for implementing mitigation measure.</p>
42 percent increase in total regional person-trips	Implement the RMP preferred strategy which calls for:	Yes	
Little change in the proportion of intracounty home-work trips to total home-work trips regionally or within counties	<ul style="list-style-type: none"> o facility development with 1,857 lane-miles of new roadway construction, 1,251 lane-miles of new high occupancy vehicle (HOV) capacity; feeder and local circulation transit development to support new and expanded line haul transit in identified corridors connecting all activity centers in the metropolitan portion of the region; 		
64 percent increase in home-work trips from Riverside and San Bernardino Counties to Los Angeles County; 80 percent increase from Riverside and San Bernardino Counties to Orange County; 137 percent increase between Riverside and San Bernardino Counties	<ul style="list-style-type: none"> o implementation of jobs-housing balance policies to shift 9 percent of new jobs to job-poor areas and 4.5 percent of new housing to housing-poor areas; o demand management through the South Air Quality Management District's Regulation XV, modified work weeks, employment center carpool goals, increased transit work trips, and extended peak periods; and 		
6 percent increase in average trip time and an 8 percent increase in average trip length	<ul style="list-style-type: none"> o system management of the existing and proposed roadway system through programs such as "SMART Freeway" technology; CALLBOX service authorities; and expansion of model separation programs, ramp metering, HOV ramp-meter-bypass installations, synchronized signals, and pavement management programs. 		
29 percent of the hours of travel would be spent traveling at less-than-free-flow speeds, compared to 10 percent in 1984			

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
57 percent increase in regional vehicle miles traveled (VMT) with a 231 percent increase in VMT in Riverside and San Bernardino Counties			
48 percent increase in miles of congestion during the a.m. and p.m. peak hours with 79 percent of the congestion in Los Angeles and Orange Counties			
Decrease in the transit mode split from 6.6 percent to 5.1 percent			
AIR QUALITY			
Exceedence of the Draft 1988 AQMP target emissions levels (amount of emissions that could be produced in the South Coast Air Basin [SCAB] without violating federal air quality standards) as identified by the South Coast Air Management District (1988d). Target levels would be exceeded by the following amounts:	None available for ROG and NO _x if the technological breakthroughs associated with the AQMP's Tier III control measures do not become reality.		
	The following measures would partially reduce this impact, but not to less than significant:		
o reactive organic gases (ROG): 400-500 percent,	o implement the RMP preferred strategy discussed in Chapter 7 of the DEIR; and	No	15091(a)(2); mitigation measure would partially reduce the impact, but not to a less-than-significant level.
o carbon monoxide (CO): 20-25 percent	o implement feasible stationary, area, and mobile source control measures identified in the AQMP.	No	15091(a)(2); mitigation would partially reduce the impact, but not be a less-than-significant level.
o nitrogen oxide (NO _x): 250-350 percent,	For CO, SO _x , and inhalable particulate matter, the following measures would reduce impacts to less than significant: o implement the RMP preferred strategy discussed in Chapter 7 of the DEIR; and	Yes	15091(a)(2)

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
o sulfur oxides (SOx): 100-300 percent, and	o implement feasible stationary, area, and mobile source control measures identified in the AQMP.	Yes	15091(a)(2)
o inhalable particulate matter: 60-80 percent.			
Exceedence of the 1982 AQMP 2000 emissions estimates, which assume implementation of recommended control measures, by the following amounts:	None available for CO. The following measures would partially reduce this impact, but not to less than significant for all pollutants:		
o ROG: 75 percent,	o implement the RMP preferred strategy discussed in Chapter 7 of the DEIR; and	No	15091(a)(2); mitigation measure would partially reduce the impact, but not to a less-than-significant level.
o CO: 150-175 percent,			
o NOx: 75-100 percent,	o implement feasible stationary, area, and mobile source control measures identified in the AQMP.	No	15091(a)(2); mitigation measure would partially reduce the impact, but not to a less-than-significant level.
o SOx: up to 100 percent, and			
o Inhalable particulate matter: 50-75 percent.	For ROG, NOx, inhalable particulate matter, and SOx emissions, the following measures would reduce impacts to less than significant: o implement the RMP preferred strategy discussed in Chapter 7 of the DEIR; and o implement feasible stationary, area, and mobile source control measures identified in the AQMP.	Yes Yes	15091(a)(2) 15091(a)(2)

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
NOISE			
Exceedence of normally acceptable noise levels	<p>None available at some locations.</p> <p>The following mitigation measure would reduce this impact to a less-than-significant level at some locations:</p> <ul style="list-style-type: none"> o local and state jurisdictions should require needed noise abatement measures (such as construction of noise barriers and reduction of interior noise levels through building and site design features) to attain noise levels compatible with affected land uses; such measures should be designed based on an acoustical analysis by a qualified acoustical engineer. 	No	15091(a)(2); mitigation measure would partially reduce the impact, but not to a less-than-significant level.
ECOLOGICAL RESOURCES			
Habitat loss from encroaching development	<p>Local jurisdictions in the SCAG region, in their respective general plans, should consider adopting policies with the following objectives:</p> <ul style="list-style-type: none"> o conduct detailed inventories of biological resources that need protection to preserve natural diversity at the local and regional level; o preserve unique natural areas; o preserve prime agricultural lands, especially where such lands are connected to lands permanently set aside as conservation or open space lands; o avoid significant habitats as a prerequisite for future development plans; o improve the identification and implementation of mitigation measures for potentially impacted biological resources at the local level; and o develop funding mechanisms to purchase and dedicate important biological resource lands as reserves and preserves. 	Yes	15091(a)(2)

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
Fragmentation of remain- ing habitats	SCAG should develop a comprehensive regional plan to protect biological resources.	Yes	15091(a)(1), 15091(a)(2); SCAG will adopt and implement a comprehensive regional plan to protect biological resources, and local jurisdictions will be responsible for implementing the plan.
	Local jurisdiction in the SCAG region, in their respective general plans, should consider adopting policies with the following objectives:	Yes	15091(a)(2)
	<ul style="list-style-type: none"> o establish buffers where wildlands meet new development to form a transition area and provide some space between development and wildlands that need protection; o establish corridors between remnant habitat areas or between remnants and large wildland parcels in general and specific plans and in local, subregional, and regional conservation and open space planning; and o identify particular areas where fragmentation may be a problem and develop measures to provide or maintain corridors, translocate individual animals if numbers become too low, and provide buffers. 		
Loss of riverine, riparian, and wetland habitats	Local jurisdictions in the SCAG region, in their respective general plans, should consider adopting policies with the following objectives:	Yes	15091(a)(2)
	<ul style="list-style-type: none"> o use open space and conservation designation to protect riverine, riparian, and freshwater wetlands from development; 		
	<ul style="list-style-type: none"> o promote naturalized flood control channels such as those promoted under the California Department of Water Resources Urban Creeks Program; o support the design of flood control channels to accommodate flood flows in vegetated channels; o require all projects that impact riverine, riparian, and wetlands resources to mitigate in-kind for any habitat impacts; 		

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
Loss of individuals and habitat for rare, threatened, and endangered species	<ul style="list-style-type: none"> o support local, subregional, and regional mitigation banks that create or restore degraded riparian or wetland habitats; and o facilitate coordination with U. S. Army Corps of Engineers on Section 10/404 permits (dredged/discharge fill material) and with the California Department of Fish and Game on Fish and Game Code Section 1601-3 agreements (channel modifications) to afford maximum habitat protection and coordinated creation and restoration planning. 	Yes	15091(a)(2)
	<p>Local jurisdictions in the SCAG region, in their respective general plans, should consider adopting policies with the following objectives:</p> <ul style="list-style-type: none"> o require surveys as part of the planning process for all species that are candidate, proposed, or listed under the federal and state Endangered Species Acts; o require adequate mitigation for any development that would have an adverse impact on listed species; o encourage mitigation activities to be monitored and ensure that provisions be made in entitlements for successful implementation; o encourage enhancement of listed species habitats through conservation and open space plans to protect species whose numbers are becoming so low they soon will be listed; o recognize the development of Habitat Conservation Plans (HCP) (Section 10 of the federal Endangered Species Act) or their equivalent as special land use plans that incorporate large areas and many ownerships in a cooperative plan to support a listed species; and 		

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
	<ul style="list-style-type: none"> o encourage the development of public and private mitigation banks that incorporate large areas where habitats can be created or enhanced to compensate for habitat lost to development. 		
Loss of habitats from wildlands fire and fire suppression	Local jurisdictions in the SCAG region should support fire hazard mitigation planning that seeks to keep fuel loads suppressed without removing all the vegetation.	Yes	15091(a)(2)
Recreational impacts in desert, mountains, and coastal areas	<p>Local jurisdictions in the SCAG region should consider adopting policies with the following objectives:</p> <ul style="list-style-type: none"> o coordinate local park planning with the appropriate state departments and federal agencies; o support adequate funding for law enforcement personnel to protect reserves, preserves, parks, and other public lands; o support a wide range of facilities from intensive activity park sites to wilderness areas; and o use habitat and species surveys discussed earlier under mitigation for potential habitat and listed species losses to identify areas to be avoided for recreational activities and facilities. 	Yes	15091(a)(2)
Reduced tree vigor and increased tree mortality from air pollution	<p>Local jurisdiction in the SCAG region should consider adopting policies with the following objectives:</p> <ul style="list-style-type: none"> o support continued research to find improved strains of coniferous species that are more tolerant of pollutants; and o implement the air pollution mitigation measures identified by the Draft 1988 AQMP. 	Yes	15091(a)(2)
Effects of pollutants on nearshore ocean waters	Refer to the water quality measures for coastal areas identified above under "Water Quality."	Yes	15091(a)(2)

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
GEOLOGY AND HYDROLOGY			
Increased exposure to seismic hazards	None available. The following measures would partially reduce this impact, but not to less than significant:		
	o Local jurisdictions within the SCAG region should continue to:	No	15091(a)(2)
	- implement the Alquist-Priolo Act by identifying areas of severe seismic hazard and avoid them as development areas;		
	- develop disaster relief programs to serve the entire SCAG region and improve interjurisdictional coordination;		
	- institute programs to identify those structures throughout the SCAG region that are especially vulnerable to earthquakes and endeavor to repair or replace dangerously vulnerable buildings; and		
	- comply strictly with ordinances and regulations governing construction of homes, buildings, and facilities in seismically active areas.		
Depletion of Portland Cement Concrete (PCC) aggregate sources would increase construction costs	Local jurisdictions in the SCAG region should continue to comply with the Surface Mining and Reclamation Act, which requires them to incorporate mineral resource management policies into their general plans, such as the implementation of land use planning strategies that avoid future development on lands containing significant PCC grade aggregate resources and that site compatible uses adjacent to aggregate resource sites and along mine access routes.	Yes	15091(a)(2)

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
Potential aggravation of landslide and erosion conditions in hilly and mountainous areas	<p>Local jurisdictions in the SCAG region, in their respective general plans, should continue to require the following:</p> <ul style="list-style-type: none"> o inspection of slopes above and below proposed developments by a geotechnical engineer prior to grading and following fine grading of construction sites and adherence to recommendations for the elimination of hazardous soil and slope conditions; o implementation of fire prevention measures; o revegetation following fire damage to reduce the amount of rock, soil, and other debris that would flow downslope during rainfall events by allowing vegetation to anchor soils and detain runoff; and o installation and maintenance of sedimentation basins in appropriate locations along drainages to capture sediment, mudflows, and landslides before they reach homes and other flood damageable property. 	Yes	15091(a)(2)
Potential exposure of new development in desert areas to flash floods	<p>Local jurisdictions in the SCAG region, in their respective general plans, should continue to:</p> <ul style="list-style-type: none"> o identify flash flood wash areas and other geologic formations indicating past flooding activity, as determined by a hydrologist or hydraulic engineer experienced with flash flood conditions; o require avoidance of future development in flash flood susceptible areas; o require that information concerning flood hazard potential be posted at all access points to parks and recreation areas, in the event of rainfall, and 	Yes	15091(a)(2)

Table 1. Continued

IMPACT CATEGORY/ Significant Impacts	Mitigation Measures	Measures Mitigate Impact to Less-than- Significant Level?	Findings and Supporting Facts
	o require installation of adequate flood control structures to protect existing and future development from flash flood hazards and design of flood control structures by a registered professional engineer experienced in the design of flood control and flood protection structures for flash flood runoff events.		

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